EXHIBIT W

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PENNSYLVANIA

- - -

LISA BARBOUNIS : CIVIL ACTION NO.

: 2:19-cv-05030-JDW

vs.

:

THE MIDDLE EAST FORUM, :

and GREGG ROMAN :

(individually) :

- - -

WEDNESDAY, NOVEMBER 4, 2020

- - -

VIDEOTAPE DEPOSITION OF LISA

REYNOLDS-BARBOUNIS, taken pursuant to notice, was held by and between all parties present via communication technology using Zoom, commencing at 11:03 a.m., before Kimberly S. Gordon, a Registered Professional Reporter, Certified Court Reporter and Notary Public.

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1			1
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2			
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19	Gregg Roman		
20	ALSO PRESENT:		
	SCOTT PERLOFF, VIDEOGRAPHER		
21	DANIEL PIPES GREGG ROMAN		
22			
23			
24			

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1	
2	I N D E X
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4	
5	Testimony of: LISA REYNOLDS-BARBOUNIS
6	
7	
8	By Mr. Cavalier5, 546
9	By Mr. Gold405
10	
11	
12	
13	EXHIBITS
14	
15	EXHIBIT NUMBER DESCRIPTION PAGE MARKED
16	
17	NONE MARKED
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2		DEPOSITION SUPPORT INDEX	
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5	Direct	ion to Witness Not to Answer	
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		Page 5
1	THE VIDEOGRAPHER: We're now on	
2	the record. My name is Scott	
3	Perloff. I'm a videographer retained	
4	by Elite Litigation Solutions.	
5	Today's date is November 4, 2020.	
6	The time on the video is 11:03 a.m.	
7	This deposition is being held	
8	in the matter of Lisa Barbounis	
9	versus The Middle East Forum, et al.	
10	The deponent today is Lisa Barbounis.	
11	All counsel will be noted on	
12	the stenographic record. Our court	
13	reporter today is Kim Gordon, and she	
14	will now swear-in the witness.	
15		
16	LISA REYNOLDS-BARBOUNIS, after	
17	having been duly sworn, was examined	
18	and testified as follows:	
19		
20	EXAMINATION	
21		
22	BY MR. CAVALIER:	
23	Q. Good morning, ma'am. My name is Jon	
24	Cavalier. I'm a lawyer with Cozen O'Connor	

		Page 6
1	in Philadelphia, and I represent The Middle	
2	East Forum and Gregg Roman. I'm joined here	
3	today by some of my colleagues including	
4	Mr. Sid Gold, who represents Gregg Roman, and	
5	he will likely have some questions for you	
6	today as well.	
7	Before I start, I want to ask you	
8	about the oath you just took. What do you	
9	understand that oath to mean?	
LO	A. That I have to be completely honest	
L1	and say everything that I know to be true.	
L2	Q. And the oath included a statement	
L3	"the whole truth". What does that mean to	
L4	you?	
L5	A. Absolutely all of the truth.	
L6	Q. So, on that note, it's important to	
L7	all of us that you have the opportunity to	
8	finish your answers today. Okay?	
L9	Now, we're doing this over Zoom.	
20	That is cumbersome. People have a natural	
21	tendency to talk over each other even during	
22	live depositions. That is certainly even	
23	more true when we're doing it over video	
24	screens. So I want you to be able to get	

		Page 7
1	your whole answer out. I won't ever cut you	
2	off, and if I do, it's inadvertent. Please	
3	correct me and tell me that you weren't	
4	finished. And I'll assume that you're	
5	telling the whole truth. Fair enough?	
6	A. Fair.	
7	Q. Have you ever been deposed before?	
8	A. No.	
9	Q. So your counsel may object today to	
LO	my questions. Okay? If he does so, it's	
L1	important you let him finish and get his	
L2	objection on the record, but unless he	
L3	instructs you not to answer, you're still	
L4	required to answer the question pending even	
L5	if your counsel objects. Do you understand	
L6	that?	
L7	A. Yes.	
L8	Q. It's also important that you give	
L9	verbal answers to my questions. While this	
20	is being video-recorded, there's also a	
21	stenographic record being made, and the court	
22	reporter, who will probably hate us both by	
23	the end of the day, can't take down nods of	
24	the head, verbal ticks like "uh-huh" or	

Page 8 1 "uh-uh", things like that. 2 So, to the extent it's a yes-or-no 3 question, you have to say "yes" or "no", and 4 to the extent the question requires a longer 5 answer, you need to verbalize and vocalize 6 that answer. Do you understand? 7 Α. I understand. 8 So, before we start getting into the Ο. questions, I do want to let you know in 9 advance that some of the questions and topics 10 11 that we're going to cover today are going to 12 be intensely personal. 13 I'm aware. 14 So I want you to know in advance I'm Ο. 15 not trying to embarrass you or put you 16 through any unnecessary pain. My job today 17 is to try to gather the facts and to give you 18 the opportunity to tell your whole truth. 19 Fair enough? 20 Α. Yes. 21 So, on that note as well, if you need 22 a break at any time today, if you want to 23 take a moment, if you want to take more than a moment, if you want to break for lunch, you 24

			Page	9
1	need to use	the restroom, you're welcome to		
2	do that at	any time, and we will pause for		
3	your comfor	t or whatever else you might need.		
4	The only th	ing I would ask is that if there's		
5	a question	pending you answer that question		
6	before we b	reak.		
7	A. Oka	у.		
8	Q. Fai:	r enough?		
9	A. Uh-	huh.		
LO	Q. Are	you represented here today?		
L1	A. Yes	•		
L2	Q. By	who?		
L3	A. Set	h Carson.		
L 4	Q. Did	you prepare for your deposition		
L5	today?			
L6	A. No.			
L7	Q. Did	you speak to Mr. Carson at all		
L8	about your	deposition before today?		
L9	A. Jus	t that I had one. And he sent me		
20	the Zoom link.			
21	Q. Did	he show you any deposition		
22	transcripts	of other witnesses in this case?		
23	A. No.	But I did, I was at Delaney's		
24	deposition.			

		Page 10
1	Q. Okay. Were you at anyone else's	
2	deposition involved in what I'll call this	
3	matter?	
4	A. No.	
5	Q. Okay. Have you ever been involved in	
6	a lawsuit before?	
7	A. No.	
8	Q. Have you ever been involved in a	
9	criminal case before?	
LO	A. Well, there was a incident like where	
L1	my husband got beat up and he pressed charges	
L2	against a kid, and then they reversed	
L3	charges. So I guess I was involved in that,	
L4	but that was dropped.	
L5	Q. When you say you were involved in it,	
L6	were you a witness in that matter?	
L7	A. I don't it was so long ago. I	
L8	don't really remember like all of what	
L9	happened. But I was like, I think I was	
20	they accused me of like trying to hit	
21	somebody with a frying pan. Because my	
22	husband got jumped, so but it got dropped.	
23	So we went to I just remember	
24	showing up to court. We didn't have a lawyer	

		Page 11
1	because we didn't think we needed one, and	
2	then the judge told us to come back with a	
3	lawyer. So we got a public defender and then	
4	that was the first time I met him was the day	
5	he showed up, and it all got dropped. So	
6	that was it.	
7	Q. Do you remember about how long ago	
8	that was?	
9	A. Ooh, probably 2007 or eight-ish.	
10	Q. Okay. Do you remember if you were	
11	arrested?	
12	A. It was a Superbowl party.	
13	Q. Okay. Do you remember who played?	
14	A. No.	
15	Q. Okay. Do you remember if you were	
16	actually arrested as part of that?	
17	A. I was not.	
18	Q. Okay. Do you remember if you were	
19	issued a summons?	
20	A. I don't know. It was so long ago I	
21	don't remember, and it was like real quick.	
22	Everything was quick with that one.	
23	Q. Okay. And to the best you can	
24	recall, there was no finding of guilt or	

			Page	12
1	convict	ion?		
2	Α.	Nothing, no.		
3	Q.	No sentence imposed?		
4	Α.	Nothing.		
5	Q.	Okay. Did you talk to your husband		
6	about y	our deposition today?		
7	Α.	Just that I talked to him about		
8	his and	that it was brutal.		
9	Q.	Okay. Did you talk to him about what		
LO	you wer	e expecting today?		
L1	A.	No. I don't talk to my husband about		
L2	that st	uff. We've been talking about the		
L3	electio	n for three days now.		
L4	Q.	Not like there's anything else going		
L5	on in t	he country today, right?		
L6	A.	Right. And we have two kids, so we		
L7	talk ab	out them.		
L8	Q.	Okay. I'll ask you more about the		
L9	product	ion of documents in this case later,		
20	but are	you aware that we received medical		
21	records	concerning you on Monday?		
22	Α.	Yes.		
23	Q.	Did you review those medical records?		
24	Α.	No.		

```
Page 13
 1
             I can show you this document and I
 2
     plan to later, but for our purposes right
 3
     now, the fax stamp on those documents
 4
     indicates that they were sent on
 5
     September 24, 2020. Do you have --
 6
       Α.
             To who?
 7
             Do you have any -- to whoever
       Ο.
 8
     received them, whether that was you or your
     counsel.
 9
       Α.
             Oh.
10
11
             Do you have any idea why if those
       Ο.
12
     documents were sent out on September 24, 2020
13
     we would have only received them on Monday?
14
             No, I have no idea.
       Α.
15
             Okay. And I think I asked you this,
       Ο.
16
     but I wasn't sure about your answer. Did you
17
     review them before they were produced to us?
18
       Α.
             No.
19
             Have you ever reviewed them?
       Ο.
20
       Α.
             No.
21
             Okay. So I want to ask you about
       Q.
22
     some terms that I'll use today so that we can
23
     make sure that we're all on the same page.
     Okay? If I refer to "the Forum" or "MEF",
24
```

```
Page 14
 1
     what is your understanding of what I'm
 2
     referring to?
 3
       Α.
             The Middle East Forum.
 4
       O.
             Okay. So are we in agreement that if
 5
     we use those terms, --
 6
       Α.
             That's fine.
 7
          -- we're both going to be on the same
       Ο.
 8
     page? Okay.
 9
             If I refer to something called "the
     trade secrets action" or "the trade secrets
10
11
     case", do you know what I'm referring to?
12
             The one where they're trying to
     accuse me of stealing stuff that I didn't
13
14
     steal, that one.
15
             Let's, for now, let's call it "the
16
     matter before Judge Sanchez".
17
       Α.
            Okay.
18
           Does that work?
       Q.
19
       Α.
             Sure.
20
             So you'll understand what I'm talking
21
     about if I refer to "the trade secrets
     action"?
22
23
             Uh-huh.
       Α.
24
             Okay.
       Q.
```

```
Page 15
1
                   THE COURT REPORTER: Yes?
2
                   THE WITNESS: Yes.
                                        I'm sorry.
3
            Yes.
4
     BY MR. CAVALIER:
5
             Okay. And if I refer to "your claims
6
     in this case", do you understand that I'm
7
     referring to the assertions you made in the
8
     Complaints --
9
       Α.
             Yes.
             -- that you filed against the Forum
10
       Ο.
11
     in this action?
12
      Α.
             Yes.
13
             Okay. And if I refer to "the Forum's
       Ο.
14
     counterclaims", do you understand that I'm
15
     referring to the claims that the Forum has
16
     brought against you as a counterclaim in this
17
     same lawsuit?
18
       Α.
             Yes.
19
             Okay. What does the term "sexual
20
     assault" mean to you?
21
             "Sexual assault" is --
       Α.
22
                   MR. CARSON: Objection.
23
                   THE WITNESS: Oh. Sorry, Seth.
24
                   MR. CARSON: Objection. Calls
```

		Page 16
1	for a legal conclusion. You can	
2	answer.	
3	THE WITNESS: unwanted	
4	sexual touching.	
5	BY MR. CAVALIER:	
6	Q. What does "sexual touching" mean to	
7	you?	
8	A. Touching any part of your body that's	
9	considered to be private or inappropriate.	
10	But it also could mean like not just your	
11	private parts but like even if you, I don't	
12	know, like if you're massaging somebody's	
13	shoulder or you're doing something of a, that	
14	is with sexual intent.	
15	Q. Okay. How about "sexual harassment",	
16	what does that mean to you?	
17	A. "Sexual harassment"?	
18	MR. CARSON: Objection. Calls	
19	for a legal conclusion. You can	
20	answer.	
21	THE WITNESS: Verbal	
22	harassment, innuendo, verbal like out	
23	of a sexual nature, inappropriate	
24	sexual communication.	

		Page 17
1	For example, if somebody is	
2	showing me pictures of their	
3	conquests and talking about how they	
4	had sex with them, like Gregg Roman	
5	did to me, that is verbal sexual	
6	assault, verbal sexual abuse,	
7	whatever you were saying.	
8	BY MR. CAVALIER:	
9	Q. Okay. So this is why I'm asking you	
10	these questions. We started off talking	
11	about sexual harassment.	
12	A. Correct. That's what I meant, sorry,	
13	harassment. That's "sexual harassment".	
14	Q. So my next question to you is what	
15	does "sexual abuse" mean to you?	
16	A. "Sexual abuse"? "Sexual assault" is	
17	different than "sexual abuse" for me. I	
18	guess a sexual abuse would be like, I don't	
19	know, maybe it's just like ongoing sexual	
20	penetration I guess. I don't know.	
21	I guess there's a difference. I	
22	don't know. I never really thought about it	
23	like that.	
24	Q. Okay. That's fair enough. Can	

		Page 18
1	sexual harassment be purely verbal in your	
2	opinion?	
3	A. Yes.	
4	Q. Can sexual assault be purely verbal	
5	in your opinion?	
6	A. No. Assault is touching,	
7	Q. Okay.	
8	A physical.	
9	Q. How about general harassment of a	
10	non-sexual nature, is that something that	
11	exists in your mind?	
12	A. Yes.	
13	Q. Do you	
14	MR. CARSON: Objection. I was	
15	just going to put an objection to	
16	these questions. I don't know if	
17	you're asking for the legal	
18	definition or just for her	
19	understanding.	
20	MR. CAVALIER: I'm asking	
21	MR. CARSON: So, to the extent	
22	it calls	
23	MR. CAVALIER: I'm asking for	
24	the witness' understanding of the	

		Page 19
1	terms. You can answer.	
2	MR. CARSON: To the extent it	
3	calls	
4	THE WITNESS: Could you	
5	MR. CARSON: To the extent it	
6	calls for a legal conclusion, I	
7	object. You can answer.	
8	BY MR. CAVALIER:	
9	Q. General harassment of a non-sexual	
10	nature, what does that mean to you?	
11	MR. CARSON: Objection. You	
12	can answer.	
13	THE WITNESS: Yes, I know. I'm	
14	thinking.	
15	You can harass somebody. Like,	
16	you know, threatening them or	
17	threatening people or being, you	
18	know, aggressive in your tone and the	
19	way you speak to them, the type of	
20	things that you say, yes, there's	
21	definitely I mean I've been	
22	harassed by one of your witnesses in	
23	your case that is of a non-sexual	
24	way.	

```
Page 20
1
     BY MR. CAVALIER:
2
             Okay. So it's fair to say that
       Ο.
3
     somebody can be sexually harassed and
4
     generally non-sexually harassed by the
5
     same --
6
                   MR. CARSON: Same objection.
7
     BY MR. CAVALIER:
8
       Q. -- person, --
9
                   MR. CARSON: Sorry, Jon. Go
10
            ahead, finish your question. Sorry.
11
     BY MR. CAVALIER:
12
           -- by the same person in or outside
       Q.
     of the workplace?
13
14
      Α.
             That --
15
                   MR. CARSON: Same objection.
16
                   THE WITNESS: That can be.
17
            However, their motive is the driving
18
            force there.
     BY MR. CAVALIER:
19
20
            When you say "their motive is the
21
     driving force there", do you mean their
22
    motive is the driving force behind whether
23
     something is sexual harassment or general
    non-sexual harassment?
24
```

		Page 21
1	A. Correct.	
2	Q. Can you give me an example of what	
3	you mean?	
4	A. So we can talk about Gregg Roman. He	
5	sexually harassed me non-stop. When I	
6	wouldn't, you know, comply with his whatever,	
7	he would harass me in a way that if he didn't	
8	try to sleep with me or those type of things	
9	that may have been considered just regular	
10	harassment, but because the way he was	
11	treating me was because I wouldn't sleep with	
12	him or he was trying to sleep with me or all	
13	of those things, he did both.	
14	So they were so it's sexual	
15	harassment because it all stems from Gregg	
16	Roman wanting to sleep with me and other	
17	people, thousands of them.	
18	Q. So, if, for example, someone and	
19	you used Gregg Roman, so I'll use him as the	
20	hypothetical example here as well.	
21	A. That's why we're here, right.	
22	Q. If Gregg Roman harassed you, was	
23	abusive to you in the workplace but that	
24	harassment and abuse had no sexual	

		Page 22
1	connotations or overtones or anything but it	
2	was motivated by some sexual desire he had,	
3	you would consider that sexual harassment?	
4	MR. CARSON: Objection.	
5	THE WITNESS: Well,	
6	MR. CARSON: Objection.	
7	THE WITNESS: Well, I mean	
8	because he physically sexually like	
9	assaulted me and then verbally	
LO	sexually harassed me and then	
L1	afterwards, I mean he continued to do	
L2	that the whole time but then there	
L3	were those sprits of just regular	
L4	harassment in there and he didn't	
L5	harass me before he physically	
L6	assaulted me, yes, I consider that	
L7	all sexual harassment.	
8.	BY MR. CAVALIER:	
L9	Q. Okay. We'll come back to that in a	
20	little bit. Tell me about your educational	
21	background.	
22	A. My educational background? So I was	
23	like always described as right when I was in	
24	like grade school and high school but didn't	

```
Page 23
1
     really, wasn't focused, didn't apply myself.
2
     Really I had ADHD. I didn't find that out
3
     until later.
4
             So then after high school, I didn't
5
     go to college. I went to like a couple
6
     community college classes, just stopped
7
     going. I wound up being a real estate agent
8
     and a bartender.
             And then after that, I went to a
9
     community college. Because a lawyer said,
10
11
     "Lisa, you can do my job. Why don't you go
     to law school"? So I figured I was going to
12
13
     go be a paralegal, then work to go to law
14
     school. Got into this Honors Program in
15
     community college, and from there, I got into
16
     the University of Pennsylvania and I
17
     graduated with a Philosophy, Politics and
18
     Economics degree.
19
             And then after that, I went onto get,
     well, to start my Master in Behavioral
20
21
     Economics, and I didn't -- I am three classes
     short because of all this. So that's where I
22
23
     am.
             So your degree, your PPE degree from
24
       Q.
```

		Page 24
1	Penn is a Bachelor's?	
2	A. Yes.	
3	Q. Okay. And other than your Master's	
4	that you're three credits short on, have you	
5	had any other further education?	
6	A. I did go to Arcadia University when	
7	like I was pregnant, but I never finished and	
8	I didn't like the program. So, when the	
9	Master came up for, when the Master came up	
LO	for Penn, I jumped on that one.	
L1	Q. Okay. And what were you studying in	
L2	Arcadia?	
L3	A. Conflict Peace and Post-Conflict	
L4	Resolution.	
L5	Q. Okay. Do you remember when that was?	
L6	You said it was when you were pregnant?	
L7	A. Yes, Olivia, 2014.	
L8	Q. Okay. Can you tell me about your	
L9	employment starting with your first job out	
20	of high school I guess since you went to work	
21	after high school?	
22	A. Ooh, I had so many jobs. I was	
23	always working. I started working when I was	
24	12. I was folding pizzas in a thing and	

		Page 25
1	working as a bus girl in a family friend's	
2	restaurant, but then and I worked there	
3	forever, Graziano's.	
4	And then I was a bartender. I worked	
5	for a mortgage company, Sennett Mortgage.	
6	Then I got a real estate license, and I did	
7	that. I just, I was always working. I was	
8	bartending and doing stuff like that.	
9	Q. Okay. And can you put a date range	
LO	on that for me?	
L1	A. All the way up until 2013 when I	
L2	started work for Congress.	
L3	Q. Okay.	
L4	A. Oh, and I also worked at the Marriott	
L5	after college. I worked	
L6	Q. And how long did you do that?	
L7	A at the front desk.	
8.	Q. How long did you work at the Marriott	
L9	for?	
20	A. Maybe almost a year. I was working	
21	there and I was applying, I really wanted to	
22	do something in politics right after college,	
23	so I was just working there to, you know,	
24	have health insurance and to, you know, like	

```
Page 26
1
     just until I found something. And then while
     I was there, I got the internship on the
2
3
     Hill, and I went and did that.
4
             So you left that job because you got
       Ο.
5
     the internship?
6
       Α.
             Uh-huh.
7
                   THE COURT REPORTER: Yes?
8
                   THE WITNESS: Yes.
                                        Sorry.
9
            Yes.
     BY MR. CAVALIER:
10
11
             Can you tell me about the internship?
       Ο.
12
             I worked, I went down to Capitol, I
13
     went down to D.C. I was there for about
14
     maybe five months, I guess, something like
15
     that and I worked for Congressman Gerlach,
16
     and that turned into a full, a part-time
17
     position and then a full-time position and
18
     they just kept me.
19
             And I -- and then Congressman Gerlach
20
     retired. Congressman Costello kept like --
21
     Congressman Costello took the seat, won, took
22
    his seat, and then they kept me. I was like
23
     one of like three people that they kept on
     staff, maybe four, oh, like three of the
24
```

	Page 27
1	districts did, they kept on, and I was proud
2	to have been kept on and I had been I
3	worked there until Congressman Costello
4	decided that he wasn't going to run for
5	re-election, which is what brought me to The
6	Middle East Forum.
7	Q. Okay. So no employment between
8	working for Congressman Costello and The
9	Middle East Forum?
LO	A. Correct.
L1	Q. Okay. Do you remember why you
L2	applied for work at The Middle East Forum?
L3	A. Yes. Because it's very difficult to
L4	find work as a conservative in politics in
L5	Philadelphia or even pretty much like in
L6	this, like this part of this, like the
L7	eastern part of Pennsylvania.
8	And so I wanted to be near my kids.
L9	It was a lot I was commuting back and
20	forth to West Chester and sometimes D.C., and
21	it was like a lot. And so we were like, oh,
22	this job, they have a great mission, they,
23	you know, they believe in the same things
24	that I do, it's here, and I thought that it

		Page 28
1	would be a good opportunity.	
2	Q. Okay. I'm going to come back to that	
3	in a bit and ask you some questions about it,	
4	but you raised the issue so I'll ask you.	
5	What you said you consider yourself a	
6	conservative?	
7	A. Very, yes.	
8	Q. Can you describe what that means?	
9	A. That I believe in limited government,	
LO	traditional values. I believe in God and,	
L1	you know, personal responsibility, things	
L2	like that.	
L3	Q. You said that you believe in	
L 4	traditional values?	
L5	A. Uh-huh.	
L6	THE COURT REPORTER: Yes?	
L7	BY MR. CAVALIER:	
L8	Q. What does that mean?	
L9	A. Like that you should have like, you	
20	know, the traditional values. Like, you	
21	know, you should raise your kids with	
22	manners, and that values and things like that	
23	are important.	
24	For example, I don't know, like we	

		Page 29
1	teach my daughter like patience is waiting	
2	with a good attitude, right. Like just	
3	regular values. You know, like nuclear	
4	family values. You know, the nuclear family	
5	is the building blocks of society kind of	
6	thing.	
7	Q. Okay. And you said you believe in	
8	God?	
9	A. I do.	
LO	Q. What's your religious background?	
L1	A. I was raised Catholic. I switched to	
L2	Greek Orthodox for my husband, but I consider	
L3	myself very much a Catholic, a Christian. I	
L4	believe in Jesus Christ.	
L5	Q. And your husband you said is Greek	
L6	Orthodox?	
L7	A. Correct.	
L8	Q. Does that cause any tension between	
L9	the two of you?	
20	A. I mean other than his mother hating	
21	the fact that I'm not Greek, no.	
22	Q. Fair enough. How do you know his	
23	mother hates the fact you're not Greek?	
24	A. She says it.	

		Page 30
1	Q. Often?	
2	A. Eh, enough.	
3	Q. Okay. Do you still attend church?	
4	A. No. I haven't we just with the	
5	kids and working and being crazy, we haven't	
6	had time. Do I want to, yes. Like I went to	
7	Ash Wednesday. So, for some of the bigger	
8	holidays, I do, but not regularly like I'd	
9	like to.	
10	Q. Do you consider yourself an	
11	intelligent person?	
12	A. I mean I think that intelligence is	
13	relative, but yes.	
14	Q. Why?	
15	A. I don't consider myself stupid, if	
16	that's what you're asking.	
17	Q. Not at all. Why do you consider	
18	yourself an intelligent person?	
19	A. I'm very	
20	MR. CARSON: Objection. Let me	
21	just	
22	THE WITNESS: I'm clever.	
23	MR. CARSON: Let me just say,	
24	let me just object. I'll put an	

			Page 31
1		objection on the record. You can	
2		answer.	
3		THE WITNESS: For example, I am	
4		the type of person that if I want	
5		something done, I get it done. If I	
6		want to hang a light fixture that's	
7		like right up here, I don't call	
8		somebody to do it. I read	
9		instructions, I figure it out, turn	
10		the electric box off and wire the	
11		light and put it up myself.	
12		I think that that, you know,	
13		most people can't do things like	
14		that. They hire an electrician.	
15	BY MR.	CAVALIER:	
16	Q.	So you consider yourself a capable	
17	person'	?	
18	А.	Very, yes.	
19	Q.	Do you consider yourself an	
20	attract	tive person?	
21	Α.	I mean	
22		MR. CARSON: Objection. You	
23		can answer.	
24		THE WITNESS: Listen,	

```
Page 32
1
            relatively speaking, okay, yes, I
2
            don't consider myself unattractive,
3
            but that's a sign of good
4
            self-esteem. So I don't think
5
            there's anything wrong with that.
6
     BY MR. CAVALIER:
7
             Do you consider yourself a hard
       Ο.
8
     worker?
9
       Α.
             Yes.
             Why?
10
      Q.
11
             Because that's something been
       Α.
12
     instilled in me since I was a little kid. I
13
     work all the time. I am proud of the work
14
     that I do. I work hard. I work long hours.
15
     I give 100 percent to my job all the time.
16
             Do you consider yourself a good wife?
       Ο.
17
       Α.
             Uhm --
18
                   MR. CARSON: Objection.
19
                   THE WITNESS: Go ahead. I'm
20
            sorry, Seth. Do I consider myself --
21
                   MR. CARSON: I'm objecting to
22
            the extent that you're harassing her,
23
            but you can answer.
24
                   THE WITNESS:
                                 Okay.
```

```
Page 33
 1
                   I think that every relationship
 2
            is hard and work and no people are
 3
            perfect and that's why we have God
 4
            that forgives us, but I do the best
 5
            that I can as a wife.
 6
     BY MR. CAVALIER:
 7
             Do you consider yourself a good
       Ο.
 8
     mother?
 9
       Α.
             Yes.
10
                   MR. CARSON: Objection.
11
     BY MR. CAVALIER:
12
             Why?
       Q.
13
       Α.
             Why? Because I --
14
                   MR. CARSON: Objection.
15
                   THE WITNESS: Can I answer?
16
                   MR. CARSON: Yes.
17
     BY MR. CAVALIER:
18
       Q.
             Yes.
19
             Because I love my children with all
20
     my heart and my soul. I made sure that I
21
     work hard so that my daughter is in the type
     of school that she's in, that she has health
22
23
     insurance, that they're well taken care of,
     that they --
24
```

		Page 34
1	You know, I made, when I was a	
2	when they were babies, I made organic baby	
3	food every day until they could eat solid	
4	foods. I breast-fed both of my children for	
5	12 months. I made sure that I didn't even	
6	take a Tylenol when I was pregnant because,	
7	you know, their health is a priority to me.	
8	Everything about my kids is a priority.	
9	Q. Is it fair to say they're the most	
10	important thing in your life?	
11	A. Yes, absolutely.	
12	MR. CARSON: Objection.	
13	BY MR. CAVALIER:	
14	Q. What's your opinion of the Me Too	
15	Movement?	
16	A. I don't really	
17	MR. CARSON: Objection.	
18	THE WITNESS: Oh. Sorry, Seth.	
19	You're objecting?	
20	MR. CARSON: Yes. I mean these	
21	questions are designed to harass and	
22	embarrass.	
23	THE WITNESS: It's fine.	
24	MR. CARSON: But you can	

		Page 35
1	answer	
2	THE WITNESS: The Me Too	
3	Movement, okay. So I was I am not	
4	okay. I believe obviously that	
5	sexual harassment happens. I do not	
6	like the Me Too Movement where it is,	
7	you know, believe all women when an	
8	elected official is put up and it's	
9	intent with no evidence and it's	
10	designed to and it's designed to	
11	like, you know, politically motivate	
12	it, and I feel like a lot of the Me	
13	Too Movement was politically	
14	motivated. And I'm sure that you	
15	have statements from me that say	
16	that, you know, I'm not Me Too. I'm	
17	not. Because I think what they did	
18	to Judge Kavanaugh was a disgrace.	
19	I think that when you have no	
20	evidence of behavior at all, not	
21	even, not even, like, you know, not	
22	even I don't know. Like that lady	
23	had no evidence at all. There was no	
24	corroboration, there was no nothing,	

		Page 36
1	like she had nothing, and you come	
2	out 17 years later from something	
3	that happened in high school or	
4	20 years later or whatever it was	
5	just to take a man down because you	
6	don't believe in his political	
7	ideology. I think it's a disgrace.	
8	So that's what I think of the	
9	Me Too Movement.	
10	BY MR. CAVALIER:	
11	Q. Other than Judge Kavanaugh's	
12	Hearings, can you give me any other examples	
13	where that kind of thing has happened in your	
14	view?	
15	MR. CARSON: Objection.	
16	THE WITNESS: I mean not off	
17	the top of my head. But that's when	
18	the Me Too Movement started, so	
19	that's what the Me Too Movement was	
20	about.	
21	BY MR. CAVALIER:	
22	Q. The Me Too Movement started with	
23	Kavanaugh's Hearings?	
24	A. I think so. I'm pretty sure.	

		Page 37
1	Q. Okay.	
2	A. That's when I was first aware of it.	
3	Q. Okay. I'm going to try to show you a	
4	couple of documents here, and I'm probably	
5	going to screw it up at least once, so bear	
6	with me here as I try to do this.	
7	MR. CARSON: Jon, are you just	
8	using the Screen Share to do this	
9	today?	
10	MR. CAVALIER: Yes, I'm going	
11	to try.	
12	MR. CARSON: Okay.	
13	THE WITNESS: Do I have to open	
14	this or he'll	
15	MR. CARSON: He'll identify the	
16	Bates stamp. Let's try to follow	
17	along here.	
18	I don't think there's anything	
19	up yet. Okay.	
20	THE WITNESS: Oh. Benjamin,	
21	yes.	
22	BY MR. CAVALIER:	
23	Q. So that's my first question. Who is	
24	this?	

			Page	38
1	A.	Benjamin Baird.		
2	Q.	And who is Benjamin Baird to you?		
3	A.	Benjamin Baird, when I met him, he		
4	was a f	ellow, not an employee, of The Middle		
5	East Fo	rum. I think since then he has become		
6	an empl	oyee of The Middle East Forum. But		
7	he's a	friend of mine.		
8	Q.	When was the last time you spoke with		
9	him?			
10	A.	A couple months ago maybe.		
11	Q.	Do you remember what you talked		
12	about?			
13	A.	He called about The Middle East		
14	Forum.			
15	Q.	In what context?		
16	A.	That he was on LegiStorm and he saw		
17	that th	ey were he could see I guess past		
18	search	results and that they were, somebody		
19	in thei	r Middle East Forum LegiStorm account		
20	was loo	king into my bank account records.		
21	Q.	What's a LegiStorm account?		
22	A.	LegiStorm is a no, it wasn't		
23	LegiSto	rm. I'm sorry. LexisNexis.		
24	LexisNe	xis. I apologize. That they were in		

Page 39 1 the LexisNexis account that they used for 2 research and that somebody in there had been 3 searching me, my husband, going through our 4 bank records through the LexisNexis account. 5 So he called to tell you that? 0. 6 Α. Yes. 7 Did you talk about the case? Ο. 8 Α. He just -- I just said that No. 9 they're torturing me. Because they are. What did you mean by that? 10 Ο. 11 They're making up false allegations Α. 12 and harassing me, and Daniel Pipes is asking me for meetings and like it's just -- they're 13 14 flying over to England and getting people to 15 pay, they're paying people for fake testimony 16 against me. I mean pretty much they have a 17 private investigator following me. It's definite harassment. They're torturing me. 18 19 So I was going to, I was going to ask Ο. you about this later, but since you mentioned 20 it, let's get into it. What do you mean by 21 22 paying people for testimony? My friend over in England sent me 23 Α. 24 recordings saying that Dan Tommo, your star

		Page 40
1	witness, saying that he was their star	
2	witness and that Gregg was going to take care	
3	of him afterwards and he was going to pay him	
4	and he didn't care even how much money he got	
5	though because he just wanted to they told	
6	him that they were going to put me in jail	
7	for ten years and that I was trying to get	
8	\$10 million from this case and that I'm	
9	acting like I'm this perfect wife, and it's	
LO	all on recording.	
L1	So they flew over to England or	
L2	whatever they did, but they are paying Danny	
L3	Tommo for testimony against me.	
L4	Q. What evidence do you have that the	
L5	Forum is paying Dan Tommo?	
L6	A. Dan Tommo said it to Tommy Robinson,	
L7	who he doesn't lie to, or maybe he lies to	
8	him, I don't know what he does, he lies, but	
L9	he said it to him and there was no reason for	
20	him to lie about that.	
21	Q. So, if I understand you correctly,	
22	your evidence is something that Tommy	
23	Robinson told you that Danny Thomas	
24	A. No. No. It's Danny's words.	

	Page 4	1
1	It's a conversation between them two. It's a	
2	voice recording of them, and he says it in	
3	there that Gregg said he would take care of	
4	him, gave him a wink and a nod and told him	
5	he was going to take care of him after this	
6	was all over. And let me tell you, I know	
7	Gregg Roman, and that is not out of his	
8	character.	
9	Q. Is Dan Tommo trustworthy?	
10	A. No.	
11	Q. And yet your evidence in accusing the	
12	Forum of paying for testimony	
13	A. So wait. Wait. Wait.	
14	MR. CARSON: Wait. Let me	
15	just let him finish the question.	
16	THE WITNESS: Okay.	
17	MR. CARSON: And then let me	
18	put my objection on. Go ahead, Jon.	
19	BY MR. CAVALIER:	
20	Q. You've accused the Forum publicly	
21	through your counsel of buying testimony.	
22	A. Correct. Because they did.	
23	MR. CARSON: Wait. He didn't	
24	finish the question.	

		Page 42
1	BY MR. CAVALIER:	
2	Q. My question to is: Your only	
3	evidence of that is a recording between Danny	
4	Thomas and Tommy Robinson, correct?	
5	A. Correct.	
6	MR. CARSON: I'm going to	
7	object. Argumentative. You know,	
8	The Middle East Forum filed a lawsuit	
9	based on the guy's word too, same	
10	thing. But you can answer, whatever.	
11	MR. CAVALIER: Do me a favor	
12	and limit your objections to what's	
13	proper.	
14	MR. CARSON: Objection.	
15	Argumentative.	
16	BY MR. CAVALIER:	
17	Q. So my question to you is: Do you	
18	think it's fair to the Forum to allege that	
19	they're engaging in criminal conduct based	
20	solely on a person's word who you deem	
21	non-credible?	
22	A. Well, that's interesting because	
23	MR. CARSON: Objection.	
24	Argumentative.	

	Page 43	3
1	THE WITNESS: they're doing	
2	that to me.	
3	BY MR. CAVALIER:	
4	Q. That's not my question.	
5	A. The answer is: I know Danny Tommo,	
6	and I know that when he speaks to Tommy	
7	Robinson that he tells the truth. There was	
8	no reason for him to lie there. There is	
9	plenty of reason for him to lie against me.	
10	In that everything that he had	
11	said, because they showed me a transcript,	
12	right, of Dr. Pipes sent me a transcript	
13	of what he said was a lie, and the only	
14	reason that he would lie like that is if he	
15	was getting paid. So yes, I am 100 percent	
16	confident that those recordings are the	
17	truth.	
18	Q. So the recording between Danny Tommo	
19	and Tommy Robinson is the truth?	
20	A. Uh-huh.	
21	Q. But the recording	
22	THE COURT REPORTER: Yes?	
23	MR. CARSON: Objection. Go	
24	ahead. Finish your question.	

			Page	44
1	BY MR.	CAVALIER:		
2	Q.	But the recording between Danny		
3	Thomas	and Gregg Roman is a lie?		
4	А.	It's paid for.		
5		MR. CARSON: Objection.		
6		THE WITNESS: Because		
7		everything he said in that one was		
8		fake		
9		MR. CARSON: Hold on, Lisa.		
10		THE WITNESS: and everything		
11		he said in the recording to Tommy		
12		Robinson was true. And he even said		
13		in there		
14		MR. CARSON: Okay.		
15		THE WITNESS: I don't know		
16		anything about a list. Tommy said it		
17		in there too.		
18		Everything that was true was in		
19		the recording that I know to be true,		
20		facts of the case, okay, that I never		
21		had a list, I never gave it to		
22		anybody, I never even talked about a		
23		freakin' list, and that was in the		
24		recording and that was true, okay.		

		Page 45
	Everything he said in the Gregg Roman	
	thing was a lie.	
	MR. CARSON: And I	
BY MR.	CAVALIER:	
Q.	But sitting here today,	
	MR. CARSON: I was going to	
	say, I was going to place an	
	objection to the last question.	
	So it's important that we keep	
	the record clear so that the order of	
	operation is that there's a question;	
	if there's an objection, the	
	objection goes on the record; and	
	then there's an answer. So let's try	
	to keep it in that order, Lisa,	
	please.	
	THE WITNESS: Sure. Sorry.	
	MR. CARSON: But my objection	
	to the last question was	
	argumentative and object to form.	
	But go ahead. Sorry.	
BY MR.	CAVALIER:	
Q.	Other than his word to Tommy	
Robins	on, do you have any evidence that the	
	Q. BY MR. Q.	thing was a lie. MR. CARSON: And I BY MR. CAVALIER: Q. But sitting here today, MR. CARSON: I was going to say, I was going to place an objection to the last question. So it's important that we keep the record clear so that the order of operation is that there's a question; if there's an objection, the objection goes on the record; and then there's an answer. So let's try to keep it in that order, Lisa, please. THE WITNESS: Sure. Sorry. MR. CARSON: But my objection to the last question was argumentative and object to form. But go ahead. Sorry. BY MR. CAVALIER:

		Page 46
1	Forum or Gregg Roman has paid anyone to	
2	testify against you?	
3	A. No.	
4	MR. CARSON: Objection.	
5	THE WITNESS: You got to be	
6	quicker with that, Seth. I gave	
7	three seconds on that one.	
8	MR. CARSON: Go ahead.	
9	BY MR. CAVALIER:	
10	Q. What was your answer?	
11	A. No.	
12	Q. Other than the recording between	
13	Danny Thomas and Tommy Robinson, do you have	
14	any evidence whatsoever that the Forum, Gregg	
15	Roman or anyone else at the Forum has engaged	
16	in any kind of criminal conduct vis-a-vis	
17	Danny Thomas?	
18	MR. CARSON: Objection.	
19	THE WITNESS: Does The Middle	
20	East Forum have any other evidence	
21	that I've done anything wrong other	
22	than Danny Tommo's testimony?	
23	MR. CAVALIER: I'm going to ask	
24	that that answer is non-responsive.	

		Page 47
1	MR. CARSON: That's responsive.	
2	BY MR. CAVALIER:	
3	Q. Your answer to my last question is?	
4	A. I just said what I said.	
5	MR. CARSON: Just wait for a	
6	question, Lisa.	
7	BY MR. CAVALIER:	
8	Q. So I'll ask the question again.	
9	Other than the recorded conversation between	
10	Danny Thomas and Tommy Robinson, do you have	
11	any evidence sitting here today that the	
12	Forum, Gregg Roman or anyone else at the	
13	Forum has engaged in criminal conduct	
14	vis-a-vis Danny Thomas?	
15	A. No.	
16	MR. CARSON: Objection. Asked	
17	and answered. Object to form.	
18	Argumentative. You can answer.	
19	THE WITNESS: No.	
20	BY MR. CAVALIER:	
21	Q. What's the nature of your	
22	relationship with Ben Baird?	
23	A. We're friends.	
24	MR. CARSON: Do you guys want	

		Page 48
1	to keep this exhibit up for now?	
2	MR. CAVALIER: Yes, for now.	
3	BY MR. CAVALIER:	
4	Q. Do you have a sexual relationship	
5	with Mr. Baird?	
6	A. I do not.	
7	Q. Have you ever engaged in sexual	
8	activity with Mr. Baird?	
9	A. I have.	
10	Q. When?	
11	A. 2019.	
12	Q. And where did that occur?	
13	A. D.C.	
14	Q. Was this over a period of time or was	
15	it one discrete incident?	
16	MR. CARSON: I'm going to	
17	object.	
18	THE WITNESS: Uhm.	
19	MR. CARSON: I'm going to	
20	object. We're not going to go into a	
21	history of her sex life today, and	
22	I'm going to direct her not to answer	
23	questions if you try to. I'll allow	
24	this line of questioning to finish,	

			Page	49
1		but we are this case has nothing		
2		to do with my client's sex life.		
3		THE WITNESS: Hold on one		
4		second.		
5		MR. CARSON: So		
6		THE WITNESS: I have a		
7		question.		
8		MR. CARSON: you can answer		
9		this. But if you continue to ask		
10		questions about her sex life, I'm		
11		going to start instructing her not to		
12		answer. Because these questions are		
13		designed fully to embarrass, harass		
14		and intimidate the witness.		
15		THE WITNESS: Are you trying to		
16		suggest that if I have a sexual		
17		relationship that isn't with my		
18		husband that it's okay for Gregg		
19		Roman to sexually harass me? Is that		
20		where you're going to go with this?		
21	BY MR.	CAVALIER:		
22	Q.	Not at all.		
23	Α.	Oh. So then, I'm sorry, how is this		
24	releva	nt to your case?		

		Page	50
1	MR. CARSON: Not a question.	-	
2	MR. CAVALIER: I'm going to		
3	answer your lawyer's objection		
4	briefly by saying that, Seth, your		
5	have you read what you produced to us		
6	on Monday?		
7	MR. CARSON: I think you should		
8	assume that if I produced it I read		
9	it.		
10	MR. CAVALIER: Well, if you		
11	had, you'd know that this line of		
12	questioning is clearly relevant to		
13	this case. It's been put at issue.		
14	It relates to damages and a variety		
15	of other issues.		
16	THE WITNESS: How?		
17	MR. CAVALIER: You can talk to		
18	your lawyer about that.		
19	THE WITNESS: Well, why can't		
20	you just tell me?		
21	MR. CAVALIER: Because I'm not		
22	your counsel.		
23	THE WITNESS: Well, I don't		
24	know how it's relevant, and I'm		

			Page 51
1		asking you.	
2		MR. CARSON: There's nothing I	
3		produced on Monday that makes my	
4		client's sex life relevant to this	
5		case.	
6		MR. CAVALIER: We just disagree	
7		on that point, Seth.	
8		THE WITNESS: So I'm asking you	
9		a question. Are you trying to say	
10		that if I have sexual, a sexual	
11		relationship with somebody other than	
12		my husband that I deserve to be	
13		sexually harassed?	
14	BY MR.	CAVALIER:	
15	Q.	Of course not. But that's not the	
16	only -	_	
17	А.	Then how is this relevant?	
18	Q.	That's not the only issue in this	
19	case.	Your counsel can tell you how it's	
20	releva	nt. You know that.	
21	А.	Okay.	
22		MR. CARSON: It's not relevant.	
23		MR. CAVALIER: If you'd like to	
24		talk to her about it, you can.	

		Page 52
1	MR. CARSON: No, I can't	
2	actually tell her how it's relevant.	
3	But like I said, we're not going to	
4	go into a history of my client's sex	
5	life today. It's not going to	
6	happen.	
7	So, like I said, I'll allow	
8	this line of questioning to continue,	
9	but I'm just letting you know that	
10	question is designed solely to	
11	harass, intimidate and embarrass my	
12	client. I'm going to start	
13	instructing her not to answer those	
14	questions.	
15	So you can answer for now.	
16	THE WITNESS: I'm waiting for a	
17	question.	
18	BY MR. CAVALIER:	
19	Q. The question is: Was your sexual	
20	relationship with Ben Baird one discrete	
21	incident or	
22	A. Are you talking about the amount of	
23	times that we've had sex or the amount of	
24	times I've kissed him? What are you actually	

		Page 53
1	asking me?	
2	Q. I'm asking you for what period of	
3	time was your relationship with Ben Baird	
4	sexual in nature?	
5	A. Very brief.	
6	Q. What does that mean?	
7	A. Less than a week maybe.	
8	Q. What's the current status of your	
9	relationship with Ben Baird?	
10	A. We are friends. We have a good	
11	relationship. We're friends.	
12	MR. CAVALIER: Seth,	
13	THE WITNESS: If he came to	
14	town, I would have dinner with him.	
15	We are friends.	
16	MR. CAVALIER: Seth, why don't	
17	we go off the record for a second and	
18	have a quick phone call here, you and	
19	I?	
20	MR. CARSON: Okay.	
21	MR. CAVALIER: Because I	
22	THE WITNESS: I'm going to go	
23	get my food if you guys are going to	
24	do that.	

		Page 54
1	MR. CAVALIER: I'll tell you	I WAC DI
2	what, let's take 15 minutes. We'll	
3	go back on the record at noon.	
4	Seth, I will call you as soon	
5	as we go off the record at whatever	
6	number you tell me to, and we'll have	
7	_	
	a discussion about this. Because I	
8	don't want to bother Judge Wilson	
9	unless I absolutely have to.	
10	MR. CARSON: Well, do you want	
11	me do you have my cell phone	
12	number right in front of you?	
13	MR. CAVALIER: Why don't you	
14	give it to me?	
15	MR. CARSON: 484	
16	MR. CAVALIER: We're off the	
17	record, by the way. You can stop the	
18	record.	
19	THE VIDEOGRAPHER: 11:42 a.m.,	
20	off the record.	
21		
22	(A recess occurred.)	
23		
24	THE VIDEOGRAPHER: 12:02 p.m.,	

		Page	55
1	we're back on the record.		
2	BY MR. CAVALIER:		
3	Q. Ma'am, the transcript you referenced		
4	earlier between Gregg Roman and Danny Tommo,		
5	did, I'm sorry, between Danny Tommo and		
6	A. Tommy Robinson.		
7	Q Tommy Robinson, how did you get a		
8	copy of that?		
9	A. Tommy sent it to me.		
10	Q. How did he send it to you?		
11	A. Via WhatsApp.		
12	Q. Okay. Did he send you the actual		
13	recording or a transcript?		
14	A. The recording.		
15	Q. Did you talk to him about it?		
16	A. No. He just said, "Listen to this".		
17	He goes, "I feel like what they're doing to		
18	you is terrible. People do this stuff to me		
19	all the time. I'm in and out of courts".		
20	He's like, "I feel horrible that it's		
21	happening to you, and so this is why I'm		
22	doing this".		
23	He didn't even want to send it to me		
24	because Danny could, you know, make up lies		

	Page 56
about him and he didn't want to have Danny on	
his bad side, but he knew that what Danny was	
doing was wrong so he sent it to me.	
Q. Do you know who recorded the	
conversation?	
A. They sent voice memos back and forth	
to each other.	
Q. Do you know whether you were given	
the entire conversation?	
A. Yes. Because I have, like I have it	
back and forth. Like I hear Tommy talk, then	
I hear Danny talk, then I hear Tommy talk,	
then I hear Danny talk.	
Q. Do you know if there were any other	
text messages between Tommy Robinson and	
Danny Thomas concerning this topic?	
A. No.	
Q. No, there aren't, or no, you don't	
know?	
A. No, I don't know.	
Q. Who is Josh Crotty?	
A. Who?	
Q. Josh Crotty, C-R-O-T-T-Y.	
A. Oh, a guy I went on a lunch date with	
	his bad side, but he knew that what Danny was doing was wrong so he sent it to me. Q. Do you know who recorded the conversation? A. They sent voice memos back and forth to each other. Q. Do you know whether you were given the entire conversation? A. Yes. Because I have, like I have it back and forth. Like I hear Tommy talk, then I hear Danny talk, then I hear Tommy talk, then I hear Danny talk. Q. Do you know if there were any other text messages between Tommy Robinson and Danny Thomas concerning this topic? A. No. Q. No, there aren't, or no, you don't know? A. No, I don't know. Q. Who is Josh Crotty? A. Who? Q. Josh Crotty, C-R-O-T-T-Y.

			Page 57
1	once a	fter from, after from in New York.	
2	Q.	When did you go on a lunch date with	
3	him?		
4	А.	2019 sometime.	
5	Q.	What's the nature of your	
6	relati	onship with Mr. Crotty?	
7	A.	We had lunch once. I didn't kiss	
8	him.		
9	Q.	So this might seem redundant, but was	
10	the re	lationship ever sexual in nature?	
11	Α.	No.	
12	Q.	Who is Steve Brignoli?	
13	А.	Steve Brignoli? Steve Brignoli is a	
14	guy th	at I met at Trump.	
15	Q.	What do you mean "at Trump"?	
16	A.	Trump Hotel. Like, you know, the bar	
17	at Tru	mp Hotel where I'd hang out a lot.	
18	Q.	You just happened to meet him	
19	there		
20	A.	Yes.	
21	Q.	randomly?	
22	A.	Yes.	
23	Q.	What's the nature of your	
24	relati	onship with him?	

			Page 5	8
1	A.	Friends.		
2	Q.	Did you ever have a sexual		
3	relati	onship with him?		
4	А.	I've had what are we describing as		
5	a sexu	al relationship, by the way?		
6	Q.	I'll ask you. What does it mean to		
7	you if	I ask you what a sexual relationship		
8	is?			
9	А.	Sexual intercourse.		
10	Q.	So, using your definition, was your		
11	relati	onship with Steve Brignoli ever sexual		
12	in nat	ure?		
13	A.	Yes.		
14	Q.	And how long did that go on for?		
15	А.	I don't know, a couple weeks. He's		
16	still	calling me. I don't like him.		
17	Q.	Okay. Is he still trying to pursue a		
18	sexual	relationship with you?		
19	A.	Uh-huh.		
20		THE COURT REPORTER: Yes?		
21		THE WITNESS: Yes. Yes. Yes.		
22		Yes.		
23	BY MR.	CAVALIER:		
24	Q.	And that's something that you're not		

			Page 59
1	intere	sted in?	
2	А.	No.	
3	Q.	When was the last time you spoke with	
4	him?		
5	A.	He text me about a month ago.	
6	Q.	Do you remember the context of that	
7	text?		
8	A.	That he wanted to take me to dinner.	
9	Q.	He invited you to dinner?	
10	A.	Yes. Do you want me to look it up?	
11	Becaus	e I can look it up.	
12	Q.	No, that's okay.	
13		MR. CARSON: No, you don't have	
14		to look anything up on your phone	
15		today.	
16	BY MR.	CAVALIER:	
17	Q.	Did you decline?	
18	A.	Yes.	
19	Q.	Why?	
20	A.	I think I blew him off. I think I	
21	said,	"I'll see you later".	
22		Because I don't like him. I'm not	
23	intere	sted in him like that.	
24	Q.	Okay. Who is Will Chamberlain?	

		Page 6	0
1	A. Will Chamberlain is a reporter, like		
2	he owns Human Events in D.C.		
3	Q. What's the nature of your		
4	relationship with him?		
5	A. Friends. He's engaged.		
6	Q. How long have you been friends?		
7	A. I met him a couple times. I've been		
8	friends with him since like I guess the end		
9	of 2018, the beginning of 2019.		
10	Q. Has your relationship with		
11	Mr. Chamberlain ever been sexual in nature?		
12	MR. CARSON: Objection.		
13	BY MR. CAVALIER:		
14	Q. You can answer.		
15	MR. CARSON: Objection.		
16	THE WITNESS: Yes. Why? Why		
17	is this		
18	BY MR. CAVALIER:		
19	Q. I'm sorry, I didn't hear.		
20	A. Yes. Why is this relevant?		
21	MR. CARSON: Yes. So		
22	THE WITNESS: We're going to go		
23	through everybody I had sex with?		
24	Because I can		

		Page	61
1	MR. CARSON: Yes, I thought our		
2	conversation I am not you are		
3	not going to ask her about every man		
4	that she's ever spoken to and ask her		
5	if she had sex with them, and I am		
6	going to start telling her not to		
7	answer. Because I feel like it has		
8	nothing to do with any records that		
9	you received, has nothing to do with		
10	her damages, and so it's just not		
11	going to happen today.		
12	THE WITNESS: Listen,		
13	MR. CARSON: And if you need to		
14	call Judge Wilson to make a ruling on		
15	this, that's fine. Maybe that would		
16	be appropriate if you think that		
17	you're going to ask her questions		
18	about every guy she ever spoke to and		
19	then ask if she had sex with that		
20	guy.		
21	THE WITNESS: Let me just tell		
22	you something, sir. No, let me talk.		
23	Let me tell you something, sir.		
24	MR. CARSON: You don't		

	Page 6	2
1	THE WITNESS: No, I want to.	
2	MR. CARSON: Lisa, you don't	
3	have to.	
4	THE WITNESS: I never cheated	
5	on my husband or had an affair or	
6	anything. This is what happened, The	
7	Middle East Forum beat me down. They	
8	beat me down so bad, so bad. I never	
9	so much just looked at another man,	
LO	okay, until The Middle East Forum.	
1	And did you know that sexual	
L2	abuse survivors and sexual assault	
L3	victims and sexual people that have	
L4	been attacked by sexual predators,	
L5	like Gregg Roman, one in four have	
L6	extra things like what I do, right.	
L7	It's a classic trauma symptom. So	
18	don't you go and start blaming my sex	
L9	life on what happened to me.	
20	The only reason that I had sex	
21	with anybody was because The Middle	
22	East Forum damaged my freakin'	
23	emotional state. So please, I don't	
24	want to go there. This is The Middle	

	Page 63	
1	East Forum's The Middle East Forum	
2	did it all. They beat me down so	
3	bad, so badly that I just needed, I	
4	needed to feel happy, to feel good,	
5	to feel proud of myself.	
6	Don't you dare try to use my	
7	sexual life or my sexual anything as	
8	a reason. It wouldn't have even	
9	happened had it not been for The	
10	Middle East Forum, none of this, my	
11	marriage, my dating life, none of it.	
12	It's all The Middle East Forum's	
13	fault. Those people are predators.	
14	MR. CARSON: So, Jon,	
15	irrespective of what you might have	
16	read in medical records,	
17	MR. CAVALIER: Well, Seth,	
18	irrespective of the records, it's	
19	clearly relevant now.	
20	MR. CARSON: It's not a license	
21	to ask her about every guy she's ever	
22	had sex with. It's not a license to	
23	ask her about every guy she's ever	
24	spoken to and then ask her if she's	

		Page 64
1	had sex with that guy, and I'm not	
2	going to let it happen.	
3	MR. CAVALIER: Seth, first of	
4	all, that's not what I'm doing.	
5	THE WITNESS: Yes, it is.	
6	MR. CARSON: If that's what	
7	you're going to do to my client right	
8	now, then we need to get Judge Wilson	
9	on the phone. Because I think I	
10	mean, clearly, you're trying to	
11	intimidate and harass and rile her	
12	up, and it's not you're not asking	
13	questions for	
14	MR. CAVALIER: Seth, I wanted	
15	to give you the respect of having the	
16	conversations	
17	THE WITNESS: Excuse me. I	
18	have a question, ma'am, court	
19	reporter, whoever. I have a question	
20	for the court reporter. Did Mr. Jon	
21	Cavalier swear to tell the whole	
22	truth and nothing but the truth?	
23	Because he's not being honest right	
24	now.	

		Page	65
1	MR. CARSON: Lisa, you don't		
2	have to ask any questions to the		
3	court reporter. So		
4	MR. CAVALIER: You can ask me		
5	whatever questions		
6	MR. CARSON: You can keep		
7	asking questions, but I'm going to		
8	start instructing her not to answer.		
9	MR. CAVALIER: Seth, we just		
10	had a phone call off the record where		
11	we explained to you why this was		
12	highly relevant why it's based on		
13	documented evidence		
14	MR. CARSON: I'm not going		
15	to		
16	MR. CAVALIER: that was		
17	given by the witness today to her		
18	treating physician and why it's		
19	relevant to the damages in this case.		
20	MR. CARSON: That does not		
21	MR. CAVALIER: You agreed to		
22	that.		
23	MR. CARSON: Jon, that doesn't		
24	give you a license to ask her about		

		Page 66
1	every guy, the name of every guy	
2	she's ever come in contact with and	
3	then ask if she's had sex with that	
4	guy.	
5	MR. CAVALIER: Not what I'm	
6	doing.	
7	MR. CARSON: And if you think	
8	that's	
9	THE WITNESS: Yes, it is.	
10	MR. CARSON: a license to do	
11	that Lisa, just let me handle it.	
12	If you think that gives you a	
13	license to do that, then we need to	
14	get Judge Wilson on the phone.	
15	MR. CAVALIER: Fair enough.	
16	Argumentative.	
17	BY MR. CAVALIER:	
18	Q. Tell me the names of I wanted to	
19	do this a different way but your counsel is	
20	insisting, so I'll apologize in advance.	
21	Tell me the names of all of the	
22	people that you've had a sexual relationship	
23	between 2017 and today.	
24	A. That's none of your business.	

		Page 6	57
1	MR. CARSON: Objection. You		
2	don't have to answer that question.		
3	THE WITNESS: I'm not going to.		
4	It's not fair to them.		
5	MR. CARSON: Yes, you don't		
6	have to.		
7	THE WITNESS: That's		
8	disrespecting		
9	MR. CARSON: Lisa,		
10	THE WITNESS: their privacy.		
11	MR. CARSON: Lisa, just let me		
12	put the objection on the record.		
13	Let's have a clear record after this		
14	is over today. All right? You		
15	answer Jon's questions, and I'll put		
16	the objections on the record. If I		
17	instruct you not to answer, you don't		
18	answer. All right?		
19	I'm going to put an objection		
20	on the record. The question is		
21	designed to embarrass, harass and		
22	intimidate. You don't have to answer		
23	that question.		
24	THE WITNESS: Thank you.		

		Page 68
1	MR. CAVALIER: Are you	
2	instructing the witness not to answer	
3	any more questions along this line?	
4	MR. CARSON: Jon, I think the	
5	record is clear. If you want the	
6	court reporter to read back what I	
7	just, my objection, then she you	
8	can ask her to do that.	
9	MR. CAVALIER: Is there an	
10	instruction to the witness pending?	
11	MR. CARSON: Do you can we	
12	please read back my last objection?	
13		
14	(The court reporter read the pertinent part	
15	of the record.)	
16		
17	MR. CAVALIER: So, in response	
18	to that, I'll say that we had a	
19	conversation off the record where we	
20	addressed this, we explained why it's	
21	relevant, not to mention the fact	
22	that the witness just gave a	
23	statement where she blamed all of	
24	this directly on The Middle East	

		Page 69
1	Forum and Gregg Roman, and I'm	
2	entitled to explore it.	
3	MR. CARSON: You ask your	
4	questions, I'll put my objections on	
5	the record, and I'll give my client	
6	the instructions I think are	
7	appropriate.	
8	MR. CAVALIER: That's fair	
9	enough.	
10	BY MR. CAVALIER:	
11	Q. So I'll ask the question again. Was	
12	your relationship with Mr. Will Chamberlain	
13	ever sexual in nature?	
14	MR. CARSON: Objection. I'm	
15	instructing you not to answer.	
16	MR. CAVALIER: All right. I'll	
17	acknowledge your instruction for now.	
18	BY MR. CAVALIER:	
19	Q. Does the name "Twin" mean anything to	
20	you?	
21	A. Yes, he's a friend of mine. I spoke	
22	to him today.	
23	Q. You spoke to him today about what?	
24	A. The election. He asked me if Trump	

		Page 7	0
1	was going to win. Because they're praying		
2	for him to win over there.		
3	Q. What's his full name?		
4	A. His we always call him "Walton".		
5	But it's Ashley and Aaron is his full name,		
6	Aaron Walton.		
7	Q. What's the nature of your		
8	relationship with him?		
9	A. Friends.		
10	Q. Did you ever have a sexual		
11	relationship with him?		
12	MR. CARSON: Objection. You		
13	don't have to answer. I'm		
14	instructing you not to answer.		
15	THE WITNESS: I figured.		
16	BY MR. CAVALIER:		
17	Q. Was Twin involved with the Tommy		
18	Robinson campaign?		
19	A. He worked as a security guard for		
20	them once.		
21	Q. When?		
22	A. In Manchester.		
23	Q. Who is Dave Sandman?		
24	A. I don't know a Dave Sandman.		

			Page 71
1	Q.	Who is Sandman?	
2	Α.	I have a friend named Patrick	
3	Sandmar	ı.	
4	Q.	What's the nature of your	
5	relatio	onship?	
6	A.	Very good friends. He's a	
7	Q.	I'm sorry. Go ahead.	
8	A.	He's a, what do you call it, a clerk	
9	for the	e Supreme Court.	
10	Q.	What's the nature of your	
11	relatio	onship with him?	
12	Α.	Friends.	
13	Q.	Have you ever had a sexual	
14	relatio	onship with him?	
15		MR. CARSON: Objection. I'm	
16		instructing the witness not to	
17		answer.	
18		THE WITNESS: I talked to him	
19		yesterday too.	
20		MR. CARSON: There's no	
21		question pending.	
22	BY MR.	CAVALIER:	
23	Q.	Who is Ryan Coyne?	
24	Α.	Ryan Coyne is somebody that I date.	

		Page 72
1	Q. Currently?	
2	A. We stopped. We basically stopped	
3	dating March, but I currently hang out with	
4	him. I was with him watching the election	
5	yesterday. And no, I didn't have sex with	
6	him last night if you wanted to know.	
7	MR. CAVALIER: There's	
8	background noise on somebody's mike,	
9	guys.	
10	THE WITNESS: Not mine.	
11	MR. CAVALIER: No, it's not	
12	yours.	
13	MR. CARSON: Yes. There's one,	
14	two, three, four, there's four people	
15	who are listening who don't have	
16	their mikes muted.	
17	MR. CAVALIER: Yes, you got to	
18	mute your mikes, guys.	
19	MR. CARSON: Everyone needs to	
20	mute.	
21	MR. CAVALIER: Can the person	
22	who is running this deposition mute	
23	the other, the other audio? Guys,	
24	mute your mikes.	

			Page 7	73
1		THE WITNESS: Very		
2		professional.		
3		MR. CAVALIER: Can the court		
4		reporter control the muting of the		
5		microphones?		
6		THE COURT REPORTER: I think		
7		it's the videographer.		
8		MR. CAVALIER: Can the		
9		videographer control the muting of		
10		the microphones?		
11		THE VIDEOGRAPHER: Yes, I		
12		just I muted one of the phones		
13		that were		
14		MR. CAVALIER: Can you mute		
15		everybody except me, the witness and		
16		Mr. Carson, who is labeled "Erica"?		
17		THE VIDEOGRAPHER: You got it.		
18		MR. CAVALIER: Thank you.		
19		Sorry about that.		
20	BY MR.	CAVALIER:		
21	Q.	When did you meet Ryan Coyne?		
22	А.	October, no, sorry, September 6th.		
23		MR. CARSON: You guys muted me.		
24		THE WITNESS: No, you're not.		

			Page 74
1		MR. CAVALIER: You're not	
2		muted.	
3		MR. CARSON: Yes, you did.	
4		THE WITNESS: We can hear you.	
5		MR. CARSON: You muted my	
6		phone.	
7		MR. CAVALIER: Seth, your icon	
8		has been marked "muted" the whole	
9		time. We can hear you.	
10		MR. CARSON: You only can hear	
11		me when I un-mute the computer. I'm	
12		using my phone. They muted my phone.	
13		MR. CAVALIER: All right.	
14	BY MR.	CAVALIER:	
15	Q.	When did you meet	
16		MR. CARSON: Can you un-mute my	
17		phone, please?	
18	BY MR.	CAVALIER:	
19	Q.	When did you meet Ryan Coyne?	
20	Α.	September 6th	
21		MR. CARSON: You guys can't	
22		continue. My phone is muted. You	
23		need to un-mute my phone now.	
24		MR. CAVALIER: Can the court	

		Page 75
1	reporter, the videographer un-mute	
2	Erica or un-mute	
3	THE VIDEOGRAPHER: I'm sorry.	
4	Who am I un-muting?	
5	MR. CAVALIER: Seth Carson by	
6	phone.	
7	THE VIDEOGRAPHER: Which phone	
8	number is that? 9554 and a 4848?	
9	MR. CAVALIER: Seth? Which	
10	number is yours?	
11	MR. CARSON: Can you hear me	
12	now?	
13	THE WITNESS: It's echoing.	
14	MR. CARSON: My phone is still	
15	muted, and the reason it's echoing	
16	is the only way you can hear me is	
17	when I un-mute my computer.	
18	MR. CAVALIER: Seth, which	
19	phone is yours?	
20	MR. CARSON: My phone number is	
21	484.678.2210.	
22	MR. CAVALIER: Can the	
23	videographer please un-mute the 2210	
24	number?	

		Page 76
1	THE VIDEOGRAPHER: I clicked	
2	"ask to un-mute", so he'll have to	
3	actually there should be a prompt	
4	on his Zoom app on his phone.	
5	MR. CARSON: This is really	
6	you guys are screwing this up. It's	
7	still muted. Why are you taking five	
8	minutes to un-mute my phone? Can you	
9	hear me now?	
10	THE WITNESS: Yes, it's better.	
11	MR. CARSON: Now mute everyone	
12	else.	
13	THE WITNESS: Can we	
14	THE VIDEOGRAPHER: Everybody	
15	else is muted.	
16	MR. CAVALIER: I apologize for	
17	the confusion.	
18	BY MR. CAVALIER:	
19	Q. When did you meet Ryan Coyne?	
20	A. September 6, 2019.	
21	Q. Where?	
22	A. Harry's. I was right at I went	
23	to I was writing speeches late and I went	
24	to have din-, like eat with my work people	

		Page 77	7
1	and I went back to the Capitol after work,		
2	and I met him when we went to get food at		
3	Harry's in D.C.		
4	Q. When did you begin dating Mr. Coyne?		
5	A. That day.		
6	Q. Were you looking to date when you met		
7	with Mr. Coyne?		
8	A. No.		
9	Q. It just happened?		
LO	A. He was outside. One of his		
L1	employee's wives was yelling at him and I		
L2	looked over thinking it was dramatic, and he		
L3	looked over and he's like, "Help me. Don't		
L4	leave". And I went inside anyway and then I		
L5	went outside again and he came out and he		
L6	said, "I hear you're an Eagles fan too and		
L7	that I should talk to you", and so we did and		
L8	I dated him after that.		
L9	Q. You called him your boyfriend, I		
20	think?		
21	A. Yes, he was.		
22	Q. Would you consider it a serious		
23	relationship?		
24	A. Uh-huh.		

			Page 78
1		THE COURT REPORTER: Yes?	
2		THE WITNESS: Yes.	
3	BY MR.	CAVALIER:	
4	Q.	So that relationship went on from	
5	Septemb	per of 2019 through March of 2020?	
6	А.	Correct.	
7	Q.	And it was a sexual relationship in	
8	additio	on to the dating relationship, correct?	
9	Α.	It was a full-on relationship, yes.	
10	Q.	Did you love him?	
11	Α.	Yes.	
12	Q.	Did you tell him that?	
13	Α.	Yes.	
14	Q.	Why did you break up?	
15	Α.	Because he cheated on me with seven	
16	women.		
17	Q.	Were you exclusive with him on your	
18	end whi	le you were seeing him?	
19	Α.	Yes. Well, we broke up a lot, but	
20	yes, fo	or the when we were together, yes.	
21	We were	e off and on quite a bit.	
22	Q.	Did his cheating on you upset you?	
23	Α.	Yes.	
24	Q.	Why?	

			Page 79
1	Α.	Because he told me that he wasn't	
2	going t	to do that.	
3	Q.	He told you that you'd be exclusive?	
4	А.	Uh-huh.	
5		THE COURT REPORTER: Yes?	
6		THE WITNESS: Yes.	
7	BY MR.	CAVALIER:	
8	Q.	And the fact that he was lying about	
9	that wa	as upsetting to you?	
10	Α.	Correct.	
11	Q.	Because you loved him?	
12	Α.	Uh-huh.	
13	Q.	And you told him so?	
14	Α.	Yes.	
15	Q.	Do you still have a relationship with	
16	him?		
17	Α.	Yes.	
18	Q.	How would you classify that	
19	relatio	onship?	
20	Α.	Friends.	
21	Q.	I don't mean to split hairs here, but	
22	I got t	to ask the question. I	
23	Α.	I'm not having sex with him, if	
24	that's	what you're asking. I went I	

		Page 80
1	watched the election with him last night. We	
2	did not have sex. I didn't sleep at his	
3	house. We are friends. I went to his	
4	election work party yesterday.	
5	MR. CARSON: Lisa, Lisa, don't	
6	answer questions he's not asking you.	
7	Just wait for the question.	
8	THE WITNESS: I'm just saying	
9	we're not, no, we're not having sex	
10	anymore.	
11	MR. CARSON: I know	
12	BY MR. CAVALIER:	
13	Q. Did the sexual component of the	
14	relationship end in March?	
15	A. Yes. Uhm, there was a time or two	
16	after that.	
17	Q. Did you ever tell Mr. Coyne that you	
18	wanted to begin dating him again?	
19	A. Yes. I do want I mean I love him,	
20	so fine.	
21	Q. So you want to continue a romantic	
22	relationship?	
23	A. I don't know. I don't know. It's	
24	very complicated. Sometimes I do. Sometimes	

Page 81 1 I don't. I'll probably never be able to 2 trust him, so maybe not. I don't know. It's 3 very complicated. 4 How are you able to balance that kind Ο. 5 of a relationship with your marriage? 6 My marriage is -- I love my, I love Α. 7 my husband very much. One thing that I am 8 always is honest with my husband. I don't lie to him. I tell him everything. He knows 9 everything. He knows every little -- he 10 11 knows almost everything about me. 12 My husband is like my best friend and I would -- I don't know, and that's another 13 part of the reason why it's complicated, 14 15 because I don't know if I actually want to 16 get divorced. There's part of me that still 17 wants to work it out with Vasili. I just --18 it's just damaged right now. I've asked him 19 to go to therapy and stuff. He doesn't 20 believe in that. But I don't want to ruin my 21 home life with my kids. My husband has been 22 my rock. 23 And, you know, him and Ryan talked on the phone at one point about real estate when 24

		Page 82
1	I was in Las Vegas with Ryan. Like they know	
2	each other. Like it's not, it's not a, it's	
3	not a secret in my house. Ryan and Vasili	
4	talk about business.	
5	Q. Have you ever told is it okay if I	
6	refer to your husband as "Vasili"?	
7	A. Yes.	
8	Q. Have you ever told Vasili that you	
9	wanted a divorce?	
LO	A. I have in anger sometimes, but I	
L1	and he has sometimes too. But then we both	
L2	decide that we don't. And we've had a	
L3	conversation a couple weeks ago saying that	
L4	we wanted to work it out. I mean we	
L5	vacillate. It's a marriage is complicated	
L6	sometimes.	
L7	I don't really believe in divorce	
L8	either. That was the weird thing. I never	
L9	thought I would get divorced.	
20	Q. Why do you say that?	
21	A. I believe that I made a commitment to	
22	God. You know, I feel like I'm letting him	
23	down. I feel like I'm letting my husband	
24	down. I feel like I'm letting my kids down.	

```
Page 83
1
      Q.
            And to be fair, your husband is also
2
    dating, correct?
3
      A. Uh-huh.
4
                  THE COURT REPORTER: Yes?
5
                  THE WITNESS: Yes.
6
                  MR. CARSON: You have to say
7
            "yes" or "no".
8
                  THE WITNESS: Yes.
9
    BY MR. CAVALIER:
10
      Q. Do you know who he's currently
11
    dating?
12
      A.
            Skye. I can't pronounce her last
13
    name.
14
      Q. And who is that?
15
            She's his assistant I think, yes, his
16
    assistant.
17
          And he works for a real estate
    company. Is that correct?
18
19
      Α.
          Correct.
20
         And she is his assistant within that
21
    real estate company?
22
      Α.
            Correct.
23
      Q. When did you find out that he was
24
    also dating?
```

Page 84 1 I kind of encouraged him to date at 2 one point. When I was dating Ryan, I was 3 like, you know, "Go get yourself a girlfriend 4 or something". And he was reluctant. I was 5 like, you know, "Skye seems to really like 6 What about her"? And he started dating 7 her. 8 And the only thing I didn't like about that relationship is that he brought 9 her around my kids. I don't like -- I don't 10 11 want my children to have another woman 12 around. I just don't like that. So that really bothered me about their relationship, 13 14 but that's the only thing that bothered me 15 about their relationship. 16 Okay. And just so the record is 0. 17 clear, have you brought any of your 18 relationships around your children? 19 Α. No. And I got to ask the question, but is 20 21 your relationship with your husband currently 22 sexually active? 23 Α. No. 24 Do you remember when that stopped? Q.

Page 85 1 Α. I would say April of 2018. 2 What was the, what was that component Ο. 3 of the relationship like before April of 4 2018? 5 It was, you know, we have kids, we Α. 6 get tired, but we would still, you know, 7 occasionally I quess. 8 Q. Okay. I mean it wasn't, it wasn't like 9 10 super rare. 11 Okay. But this wasn't -- I don't Ο. 12 want to categorize your relationship, so I'm 13 just trying to understand. But it wasn't 14 like this was a light switch that was flipped 15 where it went from perfectly great to 16 non-existent, correct? 17 It was pretty light switch-y. Okay. So tell me about that. I'm 18 Q. 19 trying to understand. 20 So, like when I was working in 21 Congress like for Ryan Costello and for 22 Gerlach like all that time, I was, you know, 23 I was strong, confident, happy, and that translated to my home life. It translated to 24

Page 86 1 my husband and my kids and my marriage. 2 And then I started working at The 3 Middle East Forum and every -- it was like 4 freakin' torture. And then I got like sad 5 and depressed, and I wouldn't want to get off 6 the couch. I barely wanted to play with my 7 kids. I didn't want to have sex with my 8 husband. 9 I, you know, I would try to vent to Vasili for support, and he didn't really 10 11 understand and he wasn't like super there in 12 the capacity that I needed him to be. And I 13 wanted, I wanted him to, -- I'm going to get 14 upset -- I wanted him to, I don't know, be 15 there for me while I was struggling with 16 that, and he wasn't. So --17 Q. You wanted him to support you? 18 Α. So it stopped. 19 You wanted your husband to support Ο. 20 you while you were struggling, correct? 21 With The Middle East Forum, yes. 22 Like they -- it was just I needed to feel 23 good, extra good about myself because they made me feel so bad, and he didn't and I 24

```
Page 87
1
     resented him for that.
2
                   MR. CARSON: Lisa, if you need
3
            a minute to like compose yourself.
4
                   THE WITNESS: No, I'm fine.
5
                   MR. CAVALIER: You can
6
            always --
7
                   MR. CARSON: You can get some
8
            tissue.
                   MR. CAVALIER: If you need one,
9
            just say the word. Okay.
10
11
                   THE WITNESS: I'm fine.
12
     BY MR. CAVALIER:
13
             When did you start feeling that way
     about or as a result of your work at the
14
15
     Forum?
16
             It started like I guess a couple
17
    months in, and it all got worse after Israel.
18
             Tell me about why you -- tell me
       Q.
19
     about how you got the job at the Forum.
20
             I called, no, I applied through
21
     LinkedIn, and -- I applied through LinkedIn
22
     and they, Gregg and Matt called me right
23
     away, it was like maybe the next day or so
     and they said they wanted me to come in for
24
```

		Page	88
1	an interview, and I did and I met Matt across		
2	the street and I went in for an interview.		
3	And then they called me back in for a second		
4	interview with Daniel Pipes, and I got the		
5	job.		
6	Q. Did you accept the job immediately?		
7	A. No. We went back and forth about the		
8	title because it was kind of like a step		
9	down, we went back and forth about money a		
10	little bit, and then I accepted it. But I		
11	actually didn't want to accept the job. I		
12	had a bad vibe about it. I had a bad vibe		
13	about the interior, the way like the way		
14	it looked, I didn't feel like I felt like		
15	a lot of it was like not super professional.		
16	And I expressed those concerns to		
17	Vasili, and Vasili actually like convinced me		
18	to take the job because I'd be home more, you		
19	know, like I wouldn't be commuting and I		
20	would be home more because it would it's		
21	closer to work.		
22	And they said that they would have		
23	flexible hours and blah, blah, blah,		
24	blah. And I was like, "This will work. This		

			Page	89
1	is"	you know, I took it, reluctantly took		
2	it for	my husband and my children.		
3	Q.	And just to be clear, you were,		
4	before	that, you were working in West		
5	Chester	?		
6	А.	Yes.		
7	Q.	So you were commuting back and forth?		
8	А.	Yes.		
9	Q.	And what's that, about a 45-minute		
10	drive?			
11	А.	About that, yes.		
12	Q.	Depending		
13	A.	Sometimes less, sometimes more.		
14	Q.	Right. Depending on Schuylkill		
15	traffic	?		
16	A.	Correct.		
17	Q.	So being close to home is important		
18	to you	and your husband?		
19	A.	Yes. To me and my husband, yes.		
20	Q.	Tell me more about that vibe that you		
21	were ta	lking about. What was it that made		
22	you rel	uctant to accept the position?		
23	A.	Well, Gregg like in the interview		
24	well, a	couple things. Matt on the second		

		Page 90
1	time over said that the reason why, you know,	
2	they picked us is because we	
3	MR. CAVALIER: Uh-oh.	
4	MR. CARSON: Her computer	
5	froze.	
6	MR. CAVALIER: Got to love	
7	Zoom. Oh, you're back.	
8	THE WITNESS: Then in the	
9	interview	
10	MR. CAVALIER: Hold on. Lisa,	
11	you froze.	
12	MR. CARSON: Lisa, you froze	
13	about 15 seconds. Can you	
14	THE WITNESS: Oh. Is that	
15	better?	
16	MR. CAVALIER: Yes. We can see	
17	you and hear you fine now.	
18	THE WITNESS: Okay.	
19	MR. CARSON: We just didn't	
20	hear your so like go back and kind	
21	of just say your answer again.	
22	THE WITNESS: Okay. So there	
23	was a couple things that were red	
24	flags in the interview to me in	

Page 91 1 general. 2 One, when Matt -- so you have 3 to, because of the way the office was 4 set up for security reasons, like you 5 would meet somebody at a different 6 building in the lobby and then walk 7 to the, walk to the actual office. 8 And so on my second interview, like 9 on my second interview on the way over, Matt said that there was 10 11 another girl that they were hiring 12 that was going to be there, Tricia, I had never met her, and they said -- I 13 said -- and Matt said that she was 14 15 pretty and he was like, "You both are 16 hot. That's really why we hired you. 17 We pulled your resumes and looked you guys up". And I thought that that 18 was weird, right, but I thought "eh, 19 20 he's this young kid", not young kid 21 but like just trying to be funny, so 22 I kind of like blew that off. 23 And then we were in the interview with Marnie, and Marnie had 24

		Page 92
1	to go, Marnie had to go do a check or	
2	something, I forget. She had to like	
3	deposit a check at the bank by a	
4	certain hour or a certain time. She	
5	had to do something with a check. I	
6	don't remember exactly what it was.	
7	It was my interview. I wasn't paying	
8	that much attention to like what she	
9	was doing.	
LO	And then while I was there,	
1	Gregg Roman was like real weird about	
L2	like me, "So are you going to take	
L3	the job? Like do you think you're	
L 4	going to take it? Do you" like it	
L5	was almost like it wasn't like an	
L6	interview where, you know, like	
L7	you're like "ooh, do I have the job".	
L8	It was almost like they were begging	
L9	me to work there. It was a little	
20	bizarre.	
21	And then Gregg said to me when	
22	Marnie left, "It's just me and you".	
23	He's like, you know, "Marnie", he's	
24	like, "I probably shouldn't say this,	

		Page 93
1	but like Marnie says that what I	
2	really need is like a work wife. I	
3	need a work wife". And I'm like, all	
4	right, well, I used to call the woman	
5	Katherine in my office like my work	
6	wife, you know. So I like kind of	
7	put that I was like that's weird	
8	that he would say that on my freakin'	
9	interview, but you know, I put it in	
10	that category.	
11	And then the interior, when I	
12	say the interior, like it didn't look	
13	you walk into an office of a	
14	reputable any business, right. This	
15	place had like a weird green sheet	
16	thing that they use as a green screen	
17	and there was like this clear thing	
18	and it was just like sparse, and it	
19	just looked like a hodge-, like a	
20	like it wasn't like a legit business	
21	in the thing and it gave me a bad	
22	vibe.	
23	You know, I'm used to working	
24	in offices that are congressional	

		Page	94
1	offices where they look like actual		
2	offices or even the real estate		
3	office that I worked in or Vasili's		
4	office. And it just, it looked like		
5	a I said, I came home and I said		
6	to Vasili, "It's like a shit show in		
7	there". Like that's what it looked		
8	like. I don't know any other way to		
9	describe it.		
LO	But I was very reluctant. I		
1	was reluctant because of those vibes		
L2	that I got and with the things that		
L3	they said to me there but I was also		
L4	reluctant because it just, something		
L5	was like off about it, but Vasili		
L6	talked me into it I guess.		
L7	And I was reluctant because it		
L8	was a, basically like a, I was being		
L9	I'm not an assistant. You know		
20	what I mean like? And I made it		
21	clear in my interview that I didn't,		
22	like, you know, I didn't want to be		
23	an assistant. I wasn't like making		
24	meetings and scheduling things. Like		

		Page 95
1	that's not my strengths. That's not	
2	anything I'm good at. Like I could	
3	never be a congressional scheduler.	
4	Like I am not, that is not me. And	
5	they were very aware that that wasn't	
6	going to be my responsibilities.	
7	BY MR. CAVALIER:	
8	Q. You made it clear that you wanted	
9	greater responsibilities?	
10	A. Well, that I wasn't like going to	
11	like I was never taking the job under the	
12	impression that I was going to be like an	
13	actual like secretary, and they agreed that	
14	that's not what the position was and that's	
15	why they changed my title to Executive	
16	Liaison.	
17	Q. Okay.	
18	A. It was kind of like, like you know	
19	how there's a difference like Huma Abedin to	
20	Hillary Clinton. Like she's her assistant	
21	but she's not like making meetings and being	
22	a scheduler.	
23	Q. Sure.	
24	A. Right. That's where we are.	

Page 96 1 Okay. Do you think you would have 2 accepted the job without Vasili's 3 encouragement? 4 Α. No. Uh, maybe. Yes. I mean I did 5 want to be around my kids, and I needed to 6 make a move because there wasn't going to be 7 a job for Congress. And there isn't any 8 other political jobs really in PA that are Republican, it's hard to find. So yes, maybe 9 I would have, but his encouragement helped. 10 11 I don't know. I mean I can't really 12 speculate. It was --13 Looking back on it now and obviously 14 having had your experience at the Forum, does 15 it bother you that he encouraged you to take the job? 16 17 Α. No. 18 Does it both- --Q. 19 Vasili is a very good man. And he --Α. 20 that man is the, one of the very few people 21 that I have that always has only good intentions. And so even if Vasili did 22 23 anything, I would always know that he did it 24 with my best interest at heart, so how could

		Page	97
1	I ever be mad at somebody for that.		
2	Q. So you take the job?		
3	A. Uh-huh.		
4	THE COURT REPORTER: Yes?		
5	BY MR. CAVALIER:		
6	Q. Tell me about your first couple of		
7	weeks at the Forum. How did it go?		
8	A. Fine.		
9	Q. No issues?		
10	A. I mean it was just like getting		
11	acclimated, learning something new. I mean		
12	it wasn't like a, it wasn't where I		
13	Q. When was the very first time you had		
14	a problem with Gregg Roman?		
15	A. Well, Gregg was always kind of like,		
16	it's not terrible, but like he was always		
17	like weird. He was like, he'd like leer at,		
18	like look at me, stand real close, make me		
19	like come like over his shoulder real close		
20	and like bend over him to like, you know,		
21	"come, no, no, come here, like be		
22	closer".		
23	He was always like aggressive in a		
24	whatever, in like a very uncomfortable way,		

		Page	98
1	and I don't mean aggressive, like he wasn't		
2	like at that point like yelling or anything		
3	like that. He was just always like, I don't		
4	know, like you know how somebody eyes you up		
5	and down, like he was always doing that.		
6	But to be fair, you asked me earlier		
7	if I thought I was an attractive person.		
8	Well, I do think that I'm an attractive		
9	person, and part of that is because men tend		
10	to look at me, okay. I can't really walk		
11	into a Wawa without somebody usually		
12	complimenting me on the way that I look. I		
13	just went into a 7-11 yesterday and somebody		
14	said like "great dress", right, so but so		
15	I, you know, I was, at that time, like in the		
16	very beginning until like AIPAC happened and		
17	then even more so Israel, like, you know, I'm		
18	used to men looking at me.		
19	Q. Does it bother you?		
20	A. It doesn't it doesn't bother me		
21	like in general life. It bothers me when		
22	it's like my boss. I never had a, I never		
23	had a boss do that. Like Ryan Costello never		
24	did that to me. My boss Corey Walter never		

		Page 99
1	did that to me. Congressman Gerlach would	
2	have never even thought about looking at me	
3	like that. So it bothered me that it was my	
4	boss, but like I said, I'm used to it so I	
5	kind of figured I could handle it.	
6	Q. Was it a big deal to you at the time?	
7	A. It was, it was enough to be like for	
8	me to talk about it.	
9	Q. With who?	
LO	A. Yes.	
L1	Q. Who did you talk about it with?	
L2	A. Like my old co-workers, my	
L3	Katherine Urkel, like I told you, she was	
L4	like my work wife in Congressman Costello's	
L5	office. Like I would say to her, "Ugh, my	
L6	new boss is a creep, but whatever". Because	
L7	she would ask me, "How do you like your job"?	
8.	I talked about it with my mom, like	
L9	my brother, you know, just like the people	
20	that you talk to about your everyday life,	
21	especially when you start a new job everybody	
22	is asking you "how is it going".	
23	Q. Did you ever talk about it with	
24	anybody at the Forum?	

Page 100 1 No. Because the way that the Forum Α. 2 is set up there's not a lot of people 3 physically in the office. So half of the 4 staff I had never really met. Marnie and 5 Gregg like seemed to be like butt buddies, 6 thicker than thieves. It would be weird. 7 Matt is a guy that I hardly know 8 like, you know, and there wasn't really anybody to like, you know, really do that 9 with at that time. Plus I was new. You 10 11 know, nobody wants to rock the boat when 12 they're new at a job. Do you think that being an attractive 13 14 woman is an advantage in the workplace? 15 I think that --Α. 16 MR. CARSON: Objection. 17 THE WITNESS: Okay. Sorry, go 18 ahead. I think that an advantage in 19 20 the workplace that I have is being 21 tall. I don't necessarily know if 22 it's a woman thing or whatever. But 23 I think that I am tall. I'm like 5'11" and I wear four-inch heels all 24

	Page 101
the time. Because when I was little,	
my mom told me that boys would think	
that I, that it was the shoes and not	
me being so tall. She was wrong.	
But I think that being tall	
helps because a lot of people see you	
as like an equal. I mean there are	
studies done that say that tall	
people make more money or whatever it	
is. I think it's an advantage. So I	
think that that's an advantage that I	
have.	
I don't think, I don't think	
that people hire me because I'm	
pretty usually. I mean usually my	
qualifications and my work ethic and	
my job performance that I have and	
the, what do you call it, the reviews	
that I get.	
Like my Congressman Costello	
was like calling jobs giving me	
personal recommendations because I	
was so good at my job. Him and I	
still like talk and have lunch, and	
	my mom told me that boys would think that I, that it was the shoes and not me being so tall. She was wrong. But I think that being tall helps because a lot of people see you as like an equal. I mean there are studies done that say that tall people make more money or whatever it is. I think it's an advantage. So I think that that's an advantage that I have. I don't think, I don't think that people hire me because I'm pretty usually. I mean usually my qualifications and my work ethic and my job performance that I have and the, what do you call it, the reviews that I get. Like my Congressman Costello was like calling jobs giving me personal recommendations because I was so good at my job. Him and I

	Page 102
he would give me another glowing	
recommendation. He used to call me	
this, you know, like a bulldog to	
help fight for constituents and fight	
for homeless people and fight for	
veterans. Like that's what I do good	
at my jobs, all of them. So I think	
that my work performance is	
definitely key in my success.	
BY MR. CAVALIER:	
Q. Sure. And I didn't mean to imply	
anything otherwise. I was asking in a more	
general sense, not you particularly. But in	
the world in which we live, do you think that	
being	
A. I think that attractive people always	
have some type of, some advantage in general.	
Like here's an example with children.	
You see a little kid and they're shovingly	
dressed and they're sloppy, right, nobody	
like wants to go like "oh, cute little kid".	
But you see a little girl and she's dressed	
perfect or a little boy and he's dressed	
perfect with his hair done, not messy, not	
	recommendation. He used to call me this, you know, like a bulldog to help fight for constituents and fight for homeless people and fight for veterans. Like that's what I do good at my jobs, all of them. So I think that my work performance is definitely key in my success. BY MR. CAVALIER: Q. Sure. And I didn't mean to imply anything otherwise. I was asking in a more general sense, not you particularly. But in the world in which we live, do you think that being A. I think that attractive people always have some type of, some advantage in general. Like here's an example with children. You see a little kid and they're shovingly dressed and they're sloppy, right, nobody like wants to go like "oh, cute little kid". But you see a little girl and she's dressed perfect or a little boy and he's dressed

```
Page 103
1
     sticky face, guess what, people want to talk
2
     and be nice to those little kids. I mean
3
     that's just -- that's human nature.
4
             So I, you know, I don't think I'm a
5
     supermodel here that like gets everything
6
     handed to me because I'm beautiful. I don't
7
     think I'm that pretty, but I think I'm an
8
     attractive human being.
             And, again, this isn't directed
9
     particularly at you, but in the greater
10
11
     general world, do you think --
12
       Α.
             I just answered that.
13
             This is a different question. Do you
     think it's fair for attractive people to use
14
15
     their physical appearance to get ahead?
16
       Α.
                  I think it's disgusting. I
             No.
17
     think that just like I think about all things
     that it should be merit-based. Everybody
18
19
     should get jobs or get accepted to schools or
20
     anything because off of merit.
21
             How do you define "merit"?
22
       Α.
             Merit, your work ethic, your
23
     accomplishments, what you do, your test
     scores, all of that, merit.
24
```

```
Page 104
1
             Did you ever think about, before
2
     AIPAC -- and by the way, just so the record
3
     is clear, when I say "AIPAC", what does that
4
    mean to you?
5
             The conference that we went to and
6
     the incident that happened on the couch and
7
     the Ingrites (ph) Airbnb, that whole --
8
      Ο.
             So we're talking about the period of
     time from when you started at MEF --
9
       Α.
             To the AIPAC conference.
10
11
             -- to right before AIPAC. Okay?
       Ο.
12
      Α.
             Uh-huh.
13
       Ο.
             Did you ever think about quitting
     during that time period?
14
15
       Α.
             No. I would never -- I don't quit
16
     jobs.
17
       Q.
             Why not?
             It's not who I am. I either -- I
18
19
     don't -- when I say "quit", like I would
20
     never just like, I would never -- like I
21
     left -- I'm a loyal person. I left like
22
     Congress because his time was up. I don't
     think that I would ever -- like unless an
23
     amazing, you know, opportunity came up. But
24
```

		Page 105
1	I wouldn't seek it. I'm very loyal.	
2	The places I work I usually work	
3	because I believe in what I'm doing. I'm	
4	more of a person I care, like, for	
5	example, I care less about, you know, making	
6	money. I care more about the mission and	
7	like helping people and being like	
8	contributing to society. That's more	
9	important to me.	
10	So no, I'm not the type of person	
11	that would just like quit a job. I'm the	
12	type of person that will stick it out and	
13	find a way and figure out how to make it work	
14	especially if I believe in what that	
15	organization is doing, like Congress, The	
16	Middle East Forum.	
17	Q. What if you don't like	
18	MR. CARSON: Jon, can we take a	
19	five-minute bathroom break sometime	
20	in the next 15 minutes?	
21	MR. CAVALIER: I'm sorry, Seth,	
22	I didn't hear. You were a little	
23	static-y there.	
24	THE WITNESS: Can we do a	

		Page 106
1	15-minute bathroom break whenever	
2	MR. CARSON: No, I asked can we	
3	take	
4	THE WITNESS: A five-minute	
5	bathroom break.	
6	MR. CARSON: Can we do a	
7	five-minute bathroom break sometime	
8	in the next 15 minutes?	
9	MR. CAVALIER: Yes, absolutely.	
10	MR. CARSON: Okay.	
11	THE WITNESS: Thank you.	
12	MR. CARSON: Thank you.	
13	MR. CAVALIER: Absolutely. Let	
14	me get up to AIPAC, and then we'll do	
15	the break. Okay?	
16	THE WITNESS: Okay.	
17	MR. CARSON: Yes.	
18	BY MR. CAVALIER:	
19	Q. So I hear you that you're a loyal	
20	person and you don't quit jobs lightly. What	
21	if you don't like the job?	
22	MR. CARSON: Objection. You	
23	can answer.	
24	THE WITNESS: I don't it's	

		Page 107
1	I've never, I've never had a job	
2	that I didn't like because jobs are	
3	more about the greater good. So like	
4	if I needed to like, as my mom will	
5	call it, like eat shit, right, like,	
6	you know, and do the hard work and do	
7	things that you don't like for a	
8	greater purpose, that's important,	
9	that's sacrifice, that's being a good	
LO	human, right.	
L1	Like there's tons of jobs that	
L2	people don't like, right. Like	
L3	there's but the work needs to get	
L 4	done. And if it serves a good cause,	
L5	then you do the hard work, you do the	
L6	work that you don't like, you do the	
L7	work that you don't like for everyone	
L8	else.	
L9	BY MR. CAVALIER:	
20	Q. During this period of time, did you	
21	believe that your work at the Forum was for a	
22	good cause?	
23	A. Absolutely. I still do think that	
24	the work at the Forum is a good cause, and I	

Page 108 1 do think that The Middle East Forum has a 2 good mission. 3 As a matter of fact, even when I 4 started working for Congressman Randy Weber 5 after all of this, I asked him to sign on 6 bills that The Middle East Forum was 7 sponsoring. I've -- people were coming 8 around to meet with my boss and they had a packet, this is after, like my current boss 9 I'm talking, they had a packet that was 10 11 disparaging The Middle East Forum, and I 12 called up an employee at The Middle East Forum and I said, "Hey, they're passing this 13 around Congress. Let me give it to you 14 15 because they're disparaging MEF". It's about 16 the mission. It's about what they're doing. 17 Do I think that Gregg Roman is a predator, yes. Do I think that Daniel Pipes 18 19 is, you know, letting that predator control 20 him, yes. Do I think that the work that they 21 both do is good for the world, yes. 22 Q. Okay. 23 And I will always -- and I will not -- and I will not not support the mission 24

Page 109 1 that they're doing even after all they've 2 done to me. That's who I am. 3 Okay. I appreciate that Q. 4 illustration. That's helpful. 5 So let me ask this question then. 6 You take the job at the Forum. And you're 7 working up until AIPAC, right? We're not at 8 AIPAC yet. This is just from when you start until AIPAC. Is there anything that occurred 9 during that time period that you would 10 11 consider sexual assault happening to you? 12 Α. Assault, no. Harassment, yes. 13 Okay. So I want to be very clear Ο. about this. What during that time period 14 15 would you consider sexual harassment? 16 The way that Gregg would make me look 17 at chicks on his Facebook and make me look at 18 the way -- and like lean over his desk and 19 the way he would look at me and the comments 20 that he would make about my outfits and the 21 way that he would like -- you know, he would 22 like show me pictures of girls on Facebook 23 and ask me if I thought they were hot. That's inappropriate. That's sexual 24

		Page 110
1	harassment.	
2	Q. So let's take that example. When he	
3	would do something like that, how would you	
4	respond to it?	
5	A. "Gregg, you're ridiculous".	
6	Q. So what was your tone?	
7	A. Exactly what I just said. That was	
8	it, "Gregg, you're ridiculous".	
9	Q. So I mean I read your tone as sort of	
10	dismissive, like	
11	A. Correct, dismissive.	
12	Q "stop bothering me with your petty	
13	BS".	
14	A. Correct.	
15	Q. "I'm trying to work here".	
16	A. Yes.	
17	MR. CARSON: Objection.	
18	BY MR. CAVALIER:	
19	Q. Did you ever tell him "stop doing	
20	this"?	
21	A. Gregg is very scary, and Gregg, you	
22	know, he's not the kind of dude that you,	
23	like you can he's not the kind of guy that	
24	you can, I'm sure you know, tell not to do	

```
Page 111
1
     something.
2
             You know, any -- like dismissive,
3
     like I would always try to resort to like
4
     dismissive humor. Because then it was more
5
     like, "Oh, Gregg, come on, you're being
6
     weird", like that, because it was less
7
     hostile and aggressive. Because I was, you
8
     know, afraid that he would, I don't know, do
     something. He's weird.
9
             So I need you to explain that.
10
       Q.
11
     Because I've never met the man in person.
12
     So --
13
             Good for you.
       Α.
14
             So tell me what you mean by that.
       Ο.
     I'm trying to understand what you mean when
15
16
     you say that he's scary.
17
             Well, I mean physically he's
     intimidating. I mean --
18
19
       Q.
             Why?
20
             Just think about it this way, he's so
21
     intimidating that Delaney, a 22-year old
22
     girl, when we were having a meeting, thought
23
     she needed to bring pepper spray.
     brought pepper spray to a business meeting
24
```

		Page 112
1	because she was physically afraid of Gregg	
2	Roman.	
3	Like the man is big, loud,	
4	boisterous. He is and he is I've seen	
5	him be like real manipulative with employees,	
6	and that started like from Day 1. And I'm	
7	not just talking like Eman Patel was a	
8	girl that we worked with, and he told me that	
9	she was a walking lawsuit because she was	
LO	gay, Muslim and a woman. And so they were	
L1	giving her, purposely giving her work that	
L2	she couldn't do because of like constraints	
L3	on her identity so that would she would leave	
L4	on her own accord. And I saw him do that.	
L5	So I was, you know, like, "This guy is	
L6	like he'll do anything. I don't know what	
L7	he'll do. He's nuts".	
L8	Q. So let me unpack that a little bit	
L9	before we take our break. Gregg Roman said	
20	that to you about Eman?	
21	A. Yes.	
22	Q. What did you say in response?	
23	A. I said, "That's not right". And he	
24	goes, "Well, she's also not good. She's on	

Page 113 1 her way out anyway. She really doesn't want 2 to be here". And I was like, "All right, 3 well, I'm not getting involved. That's not 4 my business". 5 He would say things about all kinds 6 of people, like Judy Goodrob, and "Thelma is 7 just around because Daniel's had her here 8 forever, what does she even do". Like he was like that about every woman that worked in 9 the office. Samantha Mandeles. I can go on 10 11 for a list of any female employee that he's 12 had that I personally worked with, and he was 13 like that about all of them. 14 So was Gregg's size part of the Ο. 15 reason why you say you felt --16 Physically intimidated with him, but 17 also, like he's very manipulative. Like he would say, like for his adversaries, for 18 19 example, like Mort Klein from a different 20 agency, he would like purposely like leak 21 things to the press and do things 22 underhanded, he was very underhanded to his 23 adversaries in the political arena, and you know, I didn't want him to be underhanded 24

		Page 114
1	like that with me. So the best thing to do	
2	is maintain some type of semblance of what	
3	looks like, you know, we're cool and stay	
4	safe and put my head down and do my work.	
5	Q. So let me just back up and say	
6	something or ask you a question about	
7	something. The arena in which the Forum does	
8	its business, it's a tough business, correct?	
9	A. It doesn't, it doesn't have to be,	
LO	but yes, I mean it's all right. It's not	
L1	like it doesn't have to be tough at The	
L2	Middle East Forum. Gregg makes it	
L3	complicated I guess.	
L4	Q. That's a fair distinction. But what	
L5	I mean is out in the world, not in the	
L6	office, but out in the world,	
L7	A. Like jihad?	
L8	Q. Yes, I mean there's	
L9	MR. CARSON: Lisa, wait for the	
20	question.	
21	BY MR. CAVALIER:	
22	Q. They encounter dangerous people in	
23	what they do, correct? Have there been	
24	threats against people who work there?	

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A. So I hear that there was a threat against, like an ISIS threat like way before I ever got there. But I have never, in the two years that I worked there, I never saw any threats, any anything like that, not even close.

Actually, now that I go to Congress and I work down in D.C., I find, and it has nothing to do with me, that I don't even want to tell people that I worked for, that I worked for MEF because they considered them a joke 501(c)(3), which I don't think that they should be a joke 501(c)(3) because I think that they do good work, but that is how they are revered down here.

And so no, I think that people -- I don't think there's any danger out in the real world right now. ISIS is obliterated,

Number 1, and Number 2, -- who is their adversary? Like no, not dangerous at all, I don't think, not anymore. It wasn't while I was there. I never, I was never fearful of ISIS or jihad or Muslim extremism while I was there ever.

	Page 11	6
1	Q. Even when you travelled on behalf of	
2	the Forum?	
3	A. The only time that I was fearful for	
4	my life is in Israel with Gregg.	
5	MR. CARSON: We didn't hear	
6	what you said, Lisa. Speak up.	
7	THE WITNESS: Oh. The only	
8	time I was fearful for my life when I	
9	was with, was when I was in Israel	
L O	with Gregg. That is the only time.	
L1	BY MR. CAVALIER:	
L2	Q. During the period of time from when	
L3	you started up until AIPAC, did you ever see	
L4	Gregg do anything physically aggressive	
L5	toward anyone?	
L6	A. No.	
L7	Q. During the time between when you	
L8	started until AIPAC, did you ever witness	
L9	Gregg make any overtly sexual comments to	
20	anyone?	
21	A. Not overtly well, overtly sexual?	
22	I've heard, I heard him like, you know, like	
23	he would tell me, "I banged that chick on	
24	Facebook". I mean that's overtly sexual. So	

		Page 117
1	I guess yes.	
2	Q. That's a fair point. So let me	
3	clarify that question. During that same	
4	period of time, did you ever witness or	
5	experience Gregg Roman sexually solicit	
6	anyone who worked for the Forum?	
7	A. No.	
8	Q. And I know we're going to take a	
9	break here, but let me just cover this	
10	briefly.	
11	A. Okay.	
12	Q. I think you told me earlier that	
13	Gregg has a loud and boisterous personality	
14	and he's physically big.	
15	A. Correct.	
16	Q. All true?	
17	A. Yes.	
18	Q. Do you think you share those traits	
19	with Gregg?	
20	A. Oh, I definitely am loud and	
21	boisterous.	
22	Q. And you're tall?	
23	A. And I'm definitely and I'm	
24	definitely tall. And my voice, absolutely	

```
Page 118
1
     I'm loud. It echoes. We -- I've known that.
2
             But it's not the -- it's not -- our
3
     personalities are not similar in any stretch
4
     of the imagination. His is a more hostile
5
     angry where I'm like a bubbly loud and
6
     boisterous, and he is a monster.
7
             But at least up until AIPAC, you
       Ο.
8
     didn't believe that?
             Oh, no, I had inklings. I actually
9
     said to my husband, "I think that he's like
10
11
     on the spectrum or something. Like the dude
12
     is off", and I said that in my interview.
             But during this time, you were pretty
13
14
     close with Gregg?
15
             No, I'm never close with Gregg Roman.
      Α.
16
             Did you talk to him about your kids?
       Ο.
17
             Of course I talked to him about my
       Α.
     kids.
            I had to.
18
19
             What do you mean --
       Ο.
20
             I had to talk about my kids. I had
       Α.
21
     to talk about my family life. I made sure
     that I talked about that stuff because that
22
23
    would signal to him that I have a family, and
     no, you're not going to have sex with me.
24
```

Page 119 1 Did you go out with him socially? Q. 2 Yes. We definitely. I invited him Α. 3 out on purpose so that we would be cool. 4 Because if not, you didn't want Gregg on your 5 bad side. Of course. Absolutely. 6 So I don't understand that. If you Ο. 7 were worried about Gregg --8 Α. The best thing to do with people --MR. CARSON: Let him ask the 9 10 question. 11 THE WITNESS: Okay. 12 BY MR. CAVALIER: 13 What were you just about to say? Ο. 14 MR. CARSON: Objection. 15 THE WITNESS: The best thing to 16 do when people are manipulative and 17 like that is to be on their good 18 side. And Gregg, there were times 19 where we would go out without Gregg 20 and he didn't get invited, and he got 21 irritated. So I made sure that he 22 wouldn't get irritated and I was 23 like, "You want to come", and it was like six of us so we would be fine. 24

			Page	120
1		But everybody is like, "Ew, why are		
2		you inviting Gregg", and I'm like		
3		"because".		
4		Like they do the same thing		
5		with a guy Bill in my office right		
6		now. I love Bill. Nobody else likes		
7		Bill. Whatever, right. They can't		
8		stand him, right. And I say to them,		
9		"If you want to get on Bill's good		
10		side, all Bill needs is somebody to		
11		be nice to him. Be nice to him.		
12		Invite him out. He'll stop treating		
13		you like that". And guess what, they		
14		did, and he stopped treating them		
15		like that.		
16		That's what you do. That's how		
17		you build relationships. You be nice		
18		to people. You kill them with		
19		kindness.		
20	BY MR.	CAVALIER:		
21	Q.	So, if you didn't like Gregg, if you		
22	didn't	like the way Gregg was behaving but		
23	you			
24	Α.	I'm trying to kill him with kindness.		

		Page 121
1	I'm trying to reverse the course of his	
2	terrible behavior with kindness, with	
3	empathy, with I tried to make Gregg feel	
4	like sometimes I felt like Gregg was, like	
5	Gregg knows he's this big, unattractive	
6	monster that not a lot of people like. I	
7	mean like he admits to it, you know.	
8	And so I feel like a lot of times	
9	that people that are like that, at least from	
LO	my experience in life, is that they just need	
L1	somebody to be nice to them. And so I	
L2	figured maybe if I'm nice to this dude, he'll	
L3	treat me like a human rather than treat me	
L4	like his shitty eye-candy secretary. Maybe	
L5	if I show how good I am at work or maybe if I	
L6	show him that I have compassion and empathy	
L7	that he'll treat us right. I mean that's	
L8	who that's the kind of person I am.	
L9	That's what I do, and I do it all the time.	
20	I build, I'm very good at building	
21	relationships. I always said if I could put	
22	that on my resume, it would be my top thing.	
23	For example, my current office, we have, we	
24	have like lots of people, but not until I	

		Page 122
1	worked there did everyone become really like	
2	closer and a family and like I get them all	
3	to talk again. Like they had two staffers	
4	had a problem with the Legislative Director,	
5	and now it's gone. Because I encourage	
6	people if you just show people kindness,	
7	sometimes their bark dies down.	
8	Q. So, if Gregg was behaving in a way	
9	that you didn't like and you were not telling	
LO	him to stop and you were killing him with	
L1	kindness, how would he ever know that what he	
L2	was doing was wrong?	
L3	MR. CARSON: Objection.	
L4	THE WITNESS: Hold on a second.	
L5	Because when I would kill him with	
L6	kindness and be dismissive, I'm like,	
L7	"Gregg, stop. You're gross. It's	
L8	inappropriate", like in a dismissive,	
L9	funny way. I mean I was still	
20	letting him know.	
21	Just because my tone wasn't	
22	like "Gregg, you're the most	
23	disgusting person on the planet"	
24	doesn't mean he's not, he's not an	

		Page 123
1	idiot. Gregg is very smart. He	
2	knows when he's inappropriate. He's	
3	an adult. He knows how to act. He	
4	knows what's right and wrong, I hope	
5	so, unless he's a complete sociopath,	
6	which he might be.	
7	I mean you're a human. You	
8	know when you're doing right and	
9	wrong, don't you?	
10	BY MR. CAVALIER:	
11	Q. But he wouldn't know	
12	A. Yes, he would. He definitely knew it	
13	was unwelcome, 100 percent.	
14	Q. Well, okay, let's say	
15	A. Friend zone a guy, right. Like girls	
16	all the time, women talk about all the	
17	time,	
18	Q. What does "friend zone" mean?	
19	A "Put the guy in a friend zone. He	
20	knows he's in the friend zone". Men are very	
21	aware that they're in the friend zone, "I'm	
22	never getting anywhere with this girl. She's	
23	in the friend zone".	
24	I was trying to make sure Gregg was	

		Page 124
1	super friend-zoned. I talked to him about my	
2	husband, my family, my kids. I invited him	
3	to places, well, in group events only. I	
4	never invited Gregg out one-on-one, never.	
5	Would never do that in a million years. I	
6	tried to kill this dude with kindness and	
7	make sure he knew he was friend-zoned.	
8	Because he was.	
9	Q. And what do you mean by	
10	"friend-zoned"?	
11	A. It's like the standard urban	
12	dictionary if you want to look it up what	
13	"friend zone" means. "Friend zone" means	
14	you're not going to have sex with that	
15	person. You're in a zone that has no sexual	
16	components to it at all.	
17	Q. When you use the term "friend zone",	
18	does it imply that that's a negative place	
19	for a guy to be?	
20	A. I mean	
21	MR. CARSON: Objection.	
22	THE WITNESS: I guess. I mean	
23	it depends if if the guy likes the	
24	girl, I guess it's negative for him.	

		Page 125
1	If the girl you know, it depends	
2	on like the context I guess.	
3	BY MR. CAVALIER:	
4	Q. I'm just trying to understand. I've	
5	been married for 400 years. This is new to	
6	me.	
7	A. You've never heard of "friend-zoned"?	
8	Q. I've heard of it, but I want to know	
9	what it means to you.	
LO	A. I just told you. It means that	
L1	MR. CARSON: Objection.	
L2	THE WITNESS: you can have a	
L3	professional or a friendship	
L4	relationship with somebody and they	
L5	know clear as day that they're in a	
L6	friend zone, there's no sex	
L7	happening, no kissing, no holding	
8	hands, no physical contact,	
L9	inappropriate, all of it. Friend	
20	zone, no sex.	
21	BY MR. CAVALIER:	
22	Q. Amongst friends, is it common to	
23	have, even amongst friends in the friend	
24	zone, is it common to have banter about sex	

```
Page 126
1
     in general?
2
             Not in the workplace.
       Α.
3
                   MR. CARSON: Objection.
4
     BY MR. CAVALIER:
5
             I'm not asking about the workplace.
6
     I'm just asking in general.
7
                   MR. CARSON: Objection.
8
                   THE WITNESS: I guess, yes, but
            not in a workplace situation.
9
     BY MR. CAVALIER:
10
11
             You have -- I don't want to assume,
       Ο.
12
     so I'll ask the question. Do you have
13
     discussions with friends of any sex or gender
14
     that you're not involved with sexually about
15
     sexual things?
16
             Yes, but -- yes.
17
                   MR. CAVALIER: All right.
18
            Let's break.
19
                   MR. CARSON: All right, Jon.
20
            It's 1:05. Just 1:15?
21
                   MR. CAVALIER: Why don't we do
22
            this, Seth? I'm of the mindset that
23
            everybody always shorts the break
            time and then comes back late for
24
```

```
Page 127
1
            depositions. So let's just say 1:20,
2
            and we'll do 1:20 on the nose.
3
                   MR. CARSON: Okay, that's fine.
4
                   MR. CAVALIER: Fair enough,
5
            okay.
6
                   THE VIDEOGRAPHER: 1:05 p.m.,
7
            we're off the record.
8
9
                 (A recess occurred.)
10
11
                   THE VIDEOGRAPHER: The time is
12
            1:22 p.m. We are on the record.
13
     BY MR. CAVALIER:
14
            Okay. Ms. Barbounis, is there
      Q.
15
     anybody with you?
16
      A. Like in my home right now?
17
      Q. In the room.
      A. No, nobody in the room.
18
19
            Has there been anybody in the room
      Q.
20
    during the time we've been on the record?
21
      Α.
            No.
22
      Q.
            Okay.
23
      Α.
            My friend James is in the next room.
            James who?
24
      Q.
```

			Page 128
1	Α.	Klug.	
2	Q.	Have you talked to him about the	
3	case?		
4	Α.	No.	
5	Q.	Did you attend a Christmas party in	
6	New Yor	rk City in December of 2017?	
7	Α.	I did.	
8	Q.	Who did you attend with?	
9	Α.	Marnie, Tricia, Lea Merville. I	
10	think t	chat was it. I don't remember.	
11	Q.	Who is Raymond James?	
12	Α.	I don't know.	
13	Q.	In connection between Raymond James	
14	and tha	at Christmas party in 2017 doesn't mean	
15	anythir	ng to you?	
16	Α.	Is that the name of the place, like	
17	the com	mpany that we went maybe? I don't	
18	know.	Maybe.	
19	Q.	Fair enough. Was there drinking at	
20	the par	rty?	
21	Α.	Not really. A little bit. Honestly,	
22	I don't	even know if I had a drink at the	
23	party.		
24	Q.	Were other people drinking?	

		Page 129
1	A. I think so. It was very uneventful.	
2	Q. What do you mean by that?	
3	A. We watched a Christmas tree light up.	
4	I said hi to a nice lady with some jewelry.	
5	I don't know, there wasn't much to that	
6	party.	
7	Q. Did you stay in New York overnight?	
8	A. We did.	
9	Q. Did you observe any of the other	
LO	people who you attended with drinking?	
L1	A. I mean like maybe they had a glass of	
L2	champagne or something, but nobody was like	
L3	drinking to excess or drunk or anything like	
L4	that. We went out afterwards.	
L5	Q. Were you drinking then?	
L6	A. Uh-uh. I mean like I think I had	
L7	I think we went to a cigar bar and I think I	
L8	had a drink at the cigar bar, if I remember	
L9	right, and nobody felt like going home so we	
20	got a hotel room. Excuse me.	
21	Q. Who went to the cigar bar?	
22	A. Me, Tricia. Was Caitriona there? I	
23	don't know if Caitriona was there or not. I	
24	think she was. Me, Tricia, Marnie, Lea,	

		Page 130		
1	whoever went.			
2	Q. And you said			
3	A. I'm trying to think if Caitriona was			
4	there or not. She might have been there.			
5	Q. You said you stayed overnight?			
6	A. We did.			
7	Q. Did all of you stay in the same			
8	place?			
9	A. We stayed at the same hotel, yes. We			
LO	got, I think we got two rooms. Because I			
L1	stayed with Tricia.			
L2	Q. Did you consider the Christmas party			
L3	a work event?			
L 4	A. Well, kind yes. I mean Marnie			
L5	wanted to go so she said "do you want to go",			
L6	so we're like "sure". Because I wanted to			
L7	see the tree lit up at Rockefeller Center.			
8	And then Gregg made us take Lea and which we			
L9	weren't like loving, but we did it anyway			
20	because he said so because whatever Gregg			
21	says goes, so we did. That was it.			
22	Q. Were you hungover the next day?			
23	A. No. I was tired for sure.			
24	Q. Do you ever drink while you're at			

		Page 131
1	work?	
2	A. While I'm at work?	
3	Q. Yes.	
4	A. No, I never drank while I was at work	
5	at The Middle East Forum. I have drank at	
6	work at my current job. My boss like, you	
7	know, on Fridays, sometimes like our old	
8	Chief of Staff would, you know, we would play	
9	cards and whatever. And we had a cookout at	
LO	work in the office, like we pulled a grill	
L1	and grilled up Texas barbecue, and you know,	
L2	the smoke detectors went off, the Capitol	
L3	police came, they thought it was funny, they	
L 4	joined us.	
L5	I mean yes, we do, we do that at work	
L6	at my current job, but I never drank on my,	
L7	at any other job I've ever had.	
8	Q. Was there a lot of social activity	
L9	during your work at the Forum?	
20	A. I mean not really.	
21	Q. How frequently	
22	A. Me and Tricia	
23	Q. How frequently would you say you'd go	
24	out with your co-workers from the Forum?	

Page 132 1 I could probably count maybe ten Α. 2 times. 3 O. Ten times from when to when? 4 Α. Two years. The whole entire time I 5 worked there. 6 Ο. Okay. 7 I think I went out with like the Α. 8 Like we had the one event, like the AIPAC event at Alma de Cuba. That was like 9 the group. I did another event down there. 10 11 But then like I went out with Marnie once, we 12 went out as a group without Gregg once, we 13 went to a happy hour once with him, and I 14 think I went out with like just Tricia and I 15 like five times maybe. 16 I didn't really go out a lot then in 17 general. Because I had the kids, I was home all the time, I was doing stuff with the 18 kids, I was also in school, I had class two 19 20 nights a week. You know, I didn't have time 21 to go out. 22 Q. During the time that you were working for the Forum, how often would you say that 23 you drank? 24

Page 133 1 I hardly ever. Hardly ever. Α. 2 During the time that you worked for Ο. 3 the Forum --4 Α. Tricia would make fun of me saying 5 that she would, she could -- it was like 6 pulling teeth to get me to come out. Because 7 she was single. 8 During the time you worked at the Ο. Forum, did you ever -- well, let me ask this 9 a different way, first of all. 10 11 It's my understanding that you are, 12 during the time you were at the Forum, that you were taking certain prescriptions? 13 14 I take Adderall. Α. 15 Did you take that during your time at Ο. 16 the Forum? 17 Yes. I've been taking it since 2008. Α. Any other prescriptions? 18 Q. 19 No, I mean unless I had like a Α. 20 medical issue. I have bad kidneys. I get 21 kidney infections and kidney stones all the 22 time. Nothing other than that. So nothing --23 Q. 24 Later, I started taking Zoloft in Α.

		Page 134	
1	like that November. What is that? Like 2018	3	
2	I guess.		
3	Q. Okay. So, putting aside any what		
4	I'll call emergent issues, any other		
5	prescriptions during that time?		
6	A. No.		
7	Q. So you said you had some kidney		
8	issues?		
9	A. Yes.		
10	Q. Do you remember when they occurred?		
11	A. I don't. I had kidney stones. I		
12	have them often. I mean I had it I have		
13	kidney issues so often that it's like I		
14	was just hospitalized this Christmas for two		
15	things. I had an emergency surgery and then		
16	a second one. So I mean I have them.		
17	Q. Surgery for the kidney stones?		
18	A. Yes.		
19	Q. How long have you had issues with		
20	your kidneys?		
21	A. Since I was in high sch grade		
22	school.		
23	Q. How often does it arise?		
24	A. Once every like six months maybe.		

```
Page 135
1
     Sometimes every, once a year.
2
             Is it triggered by anything in
       Ο.
3
    particular?
4
      Α.
             Making babies. When I had -- like my
5
    body like made extra kidney stones both times
6
     I was pregnant. But no, it's just it is what
7
     it is.
8
             It's not caused by stress or anything
      0.
     like that?
9
       Α.
10
             No.
11
       Ο.
             Okay.
12
             I mean, like I've said, I had it
     since I was in grade school. I remember I
13
14
     had like, I was taking antibiotics Macrobid
15
     and they were yellow and black and the one
16
     fell like out in the car, and I was like
17
     legit in eighth grade. And this lady calls
     my mom, "Lisa had a thing in her thing". My
18
19
     mom is like, "It's Macrobid. It's black and
20
     it's yellow. She's got bad kidneys". Like
21
     it is what it is.
22
       Q.
             Is it painful?
23
       Α.
             It's always acute.
24
      Q.
             Okay.
```

Page 136 1 So it's painful at the time, but it's 2 not like a lingering pain. It's like a --3 until I have an issue, it doesn't hurt. 4 So, short of surgery, what's the Q. 5 treatment for it? 6 You pass the stone and call it a day. Α. 7 I get kidney infections, and I take an 8 antibiotic. Do you take pain medication for it? 9 0. Α. 10 No. 11 0. Have you ever --12 As a matter of fact, my body doesn't Α. really recognize pain medicine really that 13 well. My last kidney like stone they gave --14 15 like I have to take the non-, the only thing 16 that will relieve my pain is non-narcotics 17 anyway. So Toradol is usually what they give to treat me. So there's no pain medicine 18 19 really other than like a high Ibuprofen or 20 a -- or something like Toradol. 21 When was the last time you took 22 Toradol? 23 For my kidneys? Is that January? Α. Like so I had my first surgery this year was 24

		Page 137
1	the end of December, and then my second	
2	surgery was right after New Year's I think.	
3	So January.	
4	Q. And you qualified that as for your	
5	kidneys. Have you taken Toradol for anything	
6	besides your kidneys since then?	
7	A. No. I mean that's the only time I've	
8	ever taken that was for my kidneys. Like	
9	they like it's given intravenously.	
LO	Q. Do you ever take narcotic	
L1	medications?	
L2	A. No. I had, I only had narcotic	
L3	medication after my first c-section. I	
L4	didn't even have it after my second.	
L5	Q. When was your first c-section?	
L6	A. 2014. Yes, 2014.	
L7	Q. Okay. So, from the day you started	
L8	at The Middle East Forum until today, you've	
L9	never taken narcotic pain medicine?	
20	A. No.	
21	Q. You've never taken Percocet?	
22	A. No.	
23	Q. Let me go back to briefly we're	
24	still in the period of time before AIPAC.	

		Page 138
1	Okay?	
2	Did Gregg give you more	
3	responsibility at the Forum?	
4	A. He was always like dangling it like a	
5	carrot in front of my face, but not I	
6	never really had like increased	
7	responsibility. Even when he left, I didn't	
8	get whatever. No, not really. I mean it	
9	was always promised.	
10	Q. Did he ask you to organize an Israeli	
11	delegation of Parliament members on a trip to	
12	Washington, D.C. in November of 2017?	
13	A. I mean I was that's part of my	
14	regular routine responsibilities. That's not	
15	like that wasn't anything extraordinary,	
16	no. It's part of my job, my basic duty.	
17	Q. I mean it seems like a big deal to	
18	me. No?	
19	A. I mean I work with Congress members.	
20	They're members of the Knesset. Same thing.	
21	Q. Do you think that Gregg trusted you	
22	to organize things like that?	
23	A. I mean he should trust me because	
24	it's my job. I think that he expected me to	

Page 139

- 1 do my job, which I did.
- Q. Did Gregg share his personal affairs with you?
- 4 A. Not really. I mean there were things
- 5 | that like -- I don't know. Gregg like -- the
- 6 only thing that like was ever really personal
- 7 that we ever really discussed was his kid,
- 8 one of his younger kids has like a disability
- 9 or something, and his wife had said or put on
- 10 a calendar something that there was like a
- 11 | nurse coming to the home. And I said,
- 12 | "Gregg, don't you think that you should be
- 13 | there for that", and he's like, "No". And I
- 14 | was like (witness made a sound). And that
- 15 | was like the, really only the time we like
- 16 discussed his personal anything really.
- 17 Q. Did you guys talk about finances?
- 18 A. He did say that he was like looking
- 19 to buy, I mean looking to buy a home or, no,
- 20 rent a home. Because he couldn't buy or
- 21 | something like that. And so I said, "Well,
- 22 | have Vasili help you out".
- 23 Q. Did he use Vasili?
- 24 A. I don't think he used Vasili. I

		Page 140
1	think they talked once. I don't know. But	
2	he didn't use him, no.	
3	Q. So he knew you were married to Vasili	
4	at that time?	
5	A. Oh, yes.	
6	Q. And he knew Vasili	
7	A. I brought Vasili to the Christmas	
8	party. Me and Vasili were in a really good	
9	spot when I like for a long time, even	
10	when I was at The Middle East Forum. Like it	
11	was, you know, it was like a, The Middle East	
12	Forum was like a slow, bad spot that pulled	
13	me down.	
14	MR. CAVALIER: So, Seth, I'm	
15	about to go into an area here and I'm	
16	not really sure where it's going to	
17	go, but it relates to Forum business.	
18	Can we agree to seal this next piece?	
19	THE WITNESS: Seth?	
20	MR. CAVALIER: We can't, we	
21	can't hear you.	
22	THE WITNESS: Is he muted?	
23	He's calling somebody.	
24	MR. CARSON: I hope all my	

			Page 141
1		objections were getting in. By	
2		"seal", you mean if we use it as an	
3		exhibit we'll file it under seal?	
4		MR. CAVALIER: Yes, it's not a	
5		document. I just want to seal this	
6		portion of the transcript because it	
7		relates to I think there's a	
8		potential security issue. It may be	
9		nothing, but before I go into it, I	
10		just want to	
11		MR. CARSON: Yes. Just let me	
12		know when that, when that, when	
13		you're done with that, and then if we	
14		use any portion of this as an exhibit	
15		in any motion, we'll file that	
16		exhibit under seal.	
17		MR. CAVALIER: We agree. All	
18		right, thank you. I appreciate it,	
19		and I'll be quick about it. So, from	
20		this point on, we're going to mark	
21		this as sealed.	
22	BY MR.	CAVALIER:	
23	Q.	Did Mr. Roman go on a trip in	
24	Februar	ry of 2018?	

```
Page 142
1
            Gregg went on a lot of trips.
      Α.
2
            Fair enough. Do you remember him
      Q.
3
    going to Egypt in 2018?
4
      Α.
            No.
5
            You don't remember?
      Ο.
6
            Not Egypt, no. Never Egypt actually.
      Α.
    I don't ever remember that at all.
7
8
      Q.
            He never talked to you about an Egypt
9
    trip?
      Α.
            Uh-uh.
10
11
                   THE COURT REPORTER: No?
12
    BY MR. CAVALIER:
13
      Q. Did you notice any change in his
14
    behavior when he came back from travel in
15
    2018?
16
      A. No.
17
                   MR. CAVALIER: All right. We
            can mark that as the end of the
18
19
            sealed portion.
20
    BY MR. CAVALIER:
21
         Just so we're clear on that, you have
22
    no recollection of Gregg Roman going to Egypt
    in February of 2018?
23
24
      Α.
            None.
```

		Page 143		
1	Q. Okay. All right. Tell me about			
2	AIPAC.			
3	A. What do you want to know?			
4	Q. How did it start? How did the trip			
5	come about?			
6	A. Okay. So, apparently, every year			
7	they go to the AIPAC conference, and I			
8	actually wanted to go to the AIPAC			
9	conference. I wanted to go. They were like,			
10	"No. We're only paying for" whoever, you			
11	know, Gregg and EJ I think it was, whatever.			
12	And then Gregg was like, "All right, well,			
13	let's throw a big dinner for our donors".			
14	And so Gregg was looking at like Airbnbs to			
15	host them like in a house because they do a			
16	lot of those like lunches in people's houses			
17	kind of thing, like it's part of their			
18	fund-raising style I guess, but then Tricia			
19	was helping with the planning and I think			
20	that they decided on Alma de Cuba.			
21	So we went to Alma de Cuba. We were			
22	told to go and mingle with the guests, me and			
23	Tricia because we're hot, and we did. We			
24	went. EJ was there though. I think Cliff			

Page 144 1 was there. So we went. And then afterwards 2 we went to, Gregg took us to like some other 3 event, I forget what it was, Camera maybe, 4 like they were hosting an event at a bar. It 5 was all -- that was strange. He was like 6 talking to some girl about a jo- -- I don't 7 even know. It was like weird. I was trying 8 to stay away from him. And then Raheem was with us. I met 9 Raheem, who I liked. He's a very interesting 10 11 individual. I met Raheem at that dinner. I 12 sat next to him and we talked and talked and 13 talked, and we just like got along like right 14 away. We had a lot in common. He thought 15 Tricia was cute. 16 So Raheem and I are hanging out, and 17 then we went -- then Gregg took us to another bar. I forget where it was. I think at that 18 19 time he stole battleship from the bar. It 20 was like some joke from the office. And then 21 -- oh, and at the end of the night, I was like hanging out with Raheem. We were like 22 having like all these like cool and 23 interesting conversations. 24

Page 145 1 At the end of the night, Gregg was 2 like, "It's time to go", whatever, like the 3 bars were closing up or whatever. And Gregg 4 was like, "We're going back to the Airbnb I 5 got. I got this awesome Airbnb. We're going 6 to have people back there. The Pinsker" --7 the Pinskers were like I quess -- they 8 weren't donors. They were like -- we gave 9 them money I think. They were young though. They were like in their 20s. So Gregg was 10 11 like, "Oh, we're coming". I was like, "I'm 12 going to go hang out with Raheem. Because 13 Raheem and I are like friends and having a 14 good time". Gregg is like, "No, you're going 15 to get in this SUV right now". I was like, 16 "All right", so we left, and I left Raheem. 17 But then the Pinsker kids told Raheem where we were, and then Raheem showed up. 18 19 So I remember we're all sitting around. I was on this -- there was like this 20 21 big sofa and it was pretty. I was like 22 taking pictures. I was having Tricia take 23 pictures of me out on the balcony because the view was so awesome. And I -- and what 24

		Page 146
1	happened? So we're all sitting on this couch	
2	and Gregg pulls out, which I thought was so	
3	terrible, like a freakin' box of like	
4	marijuana with like five different ones on	
5	it, and he was smoking pot. I don't smoke	
6	pot. I smoked pot when I was like in high	
7	school. It made me paranoid. I don't smoke	
8	pot. I don't like it. I don't like anything	
9	it does. So, if you're going to ask that	
LO	later, I do not partake in that, no.	
L1	So what was I going to say? Oh.	
L2	So, anyway, he pulls it out and the Pinsker	
L3	kids are like whatever. I'm like, "Gregg,	
L4	like these are our people or whatever", and	
L5	so he was like "eh, whatever". So he grabbed	
L6	me like by my shoulder. I was on his right.	
L7	Tricia was on his left. He grabbed me by my	
L8	shoulder and then he grabbed Tricia like	
L9	under her ass, pulled us almost onto his lap,	
20	I think she was like touching him, and he was	
21	like, "Nobody else needs to be here but us".	
22	And I was like (witness made a sound).	
23	Actually, before that even happened	
24	though was that after? No, it was before	

		Page	147
1	that even happened. Raheem showed up at the		
2	door, and so I said, "Somebody go let Raheem		
3	in". Because you had to like have a thing to		
4	get in the building. You know what I mean?		
5	Like you couldn't just you had to like go		
6	down and let him in. You couldn't just like		
7	buzz him in. It was like this, built like,		
8	you know, a penthouse in a building. And so		
9	I said, "I'm going to go get Raheem since		
10	none of you people will". And somebody		
11	yelled out like "Raheem can suck a dick" or		
12	"you can suck a dick" or somebody said that		
13	like something flippant. And I said, "Funny.		
14	None of you's will know, you know, how I am		
15	at that", like insinuating like I'm not going		
16	to suck anybody's dick and don't talk to me		
17	like that, right. So I go down and let		
18	Raheem in. Then the couch thing happens.		
19	And then I got up, went in the kitchen.		
20	We ordered pizza. I ate a piece of		
21	pizza. And I was tired and I fell asleep on		
22	the couch. Marnie like put a blanket on me.		
23	Apparently, they like drew straws until like		
24	who was going to get the bedroom. I think		

		Page 148
1	Tricia like won the straw or whatever it was.	
2	I don't know, I was sleeping. And then or	
3	Marnie did. I forget, but whatever. And	
4	like we just stayed there because it was late	
5	and everybody was tired.	
6	So then the next day Matt calls me	
7	and he said that like Gregg woke up and was	
8	like, "Did my assistant just say that she	
9	gives good blow jobs"? No, that's not what I	
10	said, but okay. The whole point of that	
11	comment was like, "Ain't none of you getting	
12	any of that". So that was that night. Gregg	
13	was Gregg, you know, gross and inappropriate.	
14	MR. CARSON: Hello?	
15	THE WITNESS: Yes.	
16	MR. CARSON: Hello?	
17	THE COURT REPORTER: Hello.	
18	MR. CAVALIER: Yes, we can hear	
19	you.	
20	MR. CARSON: I can't hear	
21	anybody. Hang on a second, please.	
22	THE WITNESS: So tired.	
23	SPEAKER: Enter your	
24	Participant's ID followed by	

		Page 149
1	please enter the Meeting password.	-
2	You are in the meeting now. There	
3	are 12 participants in the meeting.	
4	THE WITNESS: 12?	
5	SPEAKER: This meeting is being	
6	recorded.	
7	MR. CARSON: Sorry about that,	
8	guys. I don't know what happened.	
9	I'm back.	
10	MR. CAVALIER: Can you hear us	
11	now?	
12	MR. CARSON: Yes. I don't	
13	know, my phone just hung up all of a	
14	sudden. I don't know what happened.	
15	MR. CAVALIER: Okay.	
16	BY MR. CAVALIER:	
17	Q. Let me back up a little bit. Before	
18	you went back to the Airbnb it was I'm	
19	sorry, it wasn't an Airbnb. It was a hotel	
20	room, correct?	
21	A. No, it was an Airbnb.	
22	Q. So it was like an apartment in a	
23	high-rise?	
24	A. Yes.	

			Page	150
1	Q.	Okay.		
2	A.	Mid-rise, but yes.		
3	Q.	Mid-rise, fair enough. But it was		
4	there w	ere nice views, it was a pretty		
5	apartme	nt?		
6	А.	Yes, it was gorgeous.		
7	Q.	Before you went back there, you		
8	were	what were you doing? Was the group		
9	out at	dinner?		
LO	Α.	No. We were on our second bar.		
L1	Q.	You were on your second bar. So		
L2	there w	as drinking, yes?		
L3	Α.	Yes. I wasn't drunk though, not even		
L 4	close.			
L5	Q.	Okay. Where do you draw the line		
L6	between	drinking and being drunk?		
L7	А.	Like I think I maybe had like three		
L8	drinks	all night long. I was just too tired		
L9	to drin	k that night. There was too much to		
20	do.			
21	Q.	Okay.		
22	Α.	But that was over and that's over		
23	like a	seven-hour period I mean from like the		
24	time di	nner came until 2:00 in the morning.		

```
Page 151
 1
     You know what I mean? Like it was forever.
 2
             Where do I draw the line between
 3
     being drunk and drinking? I don't know,
 4
     where like you're like, I don't know, loopy
 5
     feeling in your head.
 6
             Were there other people drinking --
       Ο.
 7
       Α.
             Yes.
 8
             -- at the bars?
       Q.
 9
       Α.
             Everybody was, yes.
             Was anybody drunk?
10
       Q.
11
             I don't think anybody was drunk, not
       Α.
12
     one person. I don't even think Gregg was
13
     drunk.
14
       Q.
             So you go back to the Airbnb?
15
             Uh-huh.
       Α.
16
             And everybody is just hanging out?
       Ο.
17
             Uh-huh. They were talking, they were
     talking like to the Pinsker kids, talking
18
     about work and what they do and, you know,
19
20
     just like BS'g. I forget, there might have
21
     been other people there too.
             I know the Pinsker kids were there.
22
23
     I was so tired. I remember being tired. But
     like there was the Pinsker kids were there,
24
```

```
Page 152
 1
     Raheem was there, there was a couple other
 2
     people there. It wasn't -- and it was like
 3
     Marnie, me, Tricia, Matt, the Pinsker kids,
 4
     somebody else.
 5
             Was the purpose of the evening to
 6
     entertain the Pinskers?
 7
             I think Gregg just wanted to hang
       Α.
 8
     out.
 9
       Q.
             Okay.
             He clearly didn't want Raheem there,
10
       Α.
11
     which I thought was --
12
       O.
             Why do you say that?
13
       Α.
             -- so bizarre. I don't know why.
14
             But why do you say that?
       Ο.
15
             I just, it's what I remember of the
       Α.
16
             He just didn't want Raheem there.
17
     was, I thought it was so strange. Like
     you're letting these weird Pinsker kids come
18
19
     back that are like 20 and Raheem is like
20
     smart and like the editor of Breitbart and
21
     has connections, and you would rather hang
22
     out with these like three, little dweebs. I
     don't know, it was like weird.
23
             So I'm trying to figure out why you
24
       Q.
```

```
Page 153
1
     would say that. Did he say to you, "I don't
2
     want Raheem here"?
3
             Yes. Yes. I said -- because he was
      Α.
4
     going to come with us like in the SUV, and he
5
     said, "I don't want Raheem to come". And I
6
     was like, "Why"? I thought it was weird.
7
             Okay. And you thought it was weird
      Q.
8
     because Raheem was a smart, intelligent guy?
            Not only that, like he begged Raheem
9
     to come to the dinner. So it didn't make
10
11
     sense to me.
12
            Okay. Did you tell him it didn't
      Ο.
13
     make sense?
14
            Yes. I said, "Why"? Like, "Why
      Α.
     not"? He's like, "I just don't want him
15
16
     there". I was like, "Okay".
17
      Q.
             Okay.
             Gregg is the boss. Like you don't
18
19
     understand, Gregg is like -- Gregg is The
20
     Middle East Forum, right. Like Daniel Pipes
21
     was giving it all over to him. Gregg makes
22
     all the decisions, he makes all the rules,
23
    he's responsible for all MEF policy.
             He's like my legit boss. I'm going
24
```

		Page 154
1	to do what my boss says. He's like, he is	
2	the top guy. You know what I mean? You're	
3	not going to be like "no" to him for	
4	anything.	
5	Q. Okay. So	
6	A. He says "go", you go. You know what	
7	I mean? Like go on a work trip. All right,	
8	that's what we're doing.	
9	Q. So you're back at the Airbnb.	
LO	A. Uh-huh.	
L1	Q. And Raheem shows up. And somebody	
L2	says, "Raheem is here".	
L3	A. I said, "Raheem is here". Because he	
L4	texted me. And I	
L5	Q. And someone else says	
L6	A. And I said, "I'm going to go let	
L7	Raheem in". Somebody yelled out, "Raheem can	
L8	suck a dick".	
L9	Q. Do you know who?	
20	A. I don't know who. I still to this	
21	day don't know who said that.	
22	Q. Was it Gregg?	
23	A. I don't think it was Gregg actually.	
24	Q. What did you take that comment to	

		Page 155
1	mean?	
2	A. I don't know, they were just being	
3	flippant. They didn't want Raheem around. I	
4	don't know, it was weird.	
5	Q. Well, my question to you is: Sitting	
6	there in that room,	
7	A. Uh-huh.	
8	Q did you take that comment as	
9	sexual in nature or was it more of a, you	
10	know, "what's fucking Raheem doing here"?	
11	A. It was yes, that was more it. It	
12	was like not directed towards me. It was	
13	directed towards him.	
14	Q. And it wasn't sexually toward him,	
15	right? He wasn't there.	
16	A. Right. I guess yes, they just said	
17	it.	
18	Q. Okay. But it wasn't a sexual	
19	comment? It was just a remark made by	
20	somebody showing displeasure that Raheem	
21	showed up?	
22	A. Uh-huh.	
23	THE COURT REPORTER: Yes?	
24	MR. CARSON: Yes or no?	

		Page 156
1	THE WITNESS: Yes. I'm sorry.	
2	Yes.	
3	BY MR. CAVALIER:	
4	Q. And your response was?	
5	A. My response? Oh, you're wondering	
6	why I said like, "Ain't none of you going to	
7	get that"? Because Gregg had been creepy all	
8	night, been touchy-feely, like looking at you	
9	being creepy. So I made it clear, "Ain't	
LO	none of you getting that".	
L1	Q. But your response to a non-sexual	
L2	comment was sexual in nature, and I'm trying	
L3	to understand why.	
L 4	A. Because Gregg made me feel	
L5	uncomfortable all night, the way he got in	
L6	the car. I kind of like even with the	
L7	Raheem thing, like that's who I was hanging	
8	out with, and he didn't want him there. Like	
L9	the whole thing was like weird. It was like	
20	Gregg was trying to get at me.	
21	Q. So you took Gregg not wanting Raheem	
22	to come back to the Airbnb as Gregg's attempt	
23	to try and get with you?	
24	A. Well, it was weird because like	

		Page 157
1	MR. CARSON: Objection.	
2	THE WITNESS: Like it was	
3	weird	
4	MR. CARSON: Objection.	
5	THE WITNESS: and that's why	
6	I didn't understand. And so kind of,	
7	yes, because so the person that	
8	I'm hanging out with the whole time	
9	who is way more influential than	
10	these little kids you don't want	
11	around, you don't want him around and	
12	you're looking at me and you're	
13	trying to sit next to me and you're	
14	trying to talk to me and you're	
15	trying to do all that and I'm just	
16	paying attention to Raheem, and	
17	that's the one you don't want there.	
18	And then you're like "come back to	
19	the Airbnb and like", blah, blah,	
20	blah, blah, blah, "get in the, get in	
21	the car". Because he didn't want	
22	everybody else was going to go. I	
23	was just going to leave with Raheem.	
24	He's like, "No, get in the SUV".	

		Page 158
1	It was me. He was he gave	
2	me that sexual, creep-ass vibe all	
3	night long. That's who he is.	
4	MR. CARSON: Can you guys hear	
5	me?	
6	MR. CAVALIER: We're hearing	
7	you.	
8	MR. CARSON: Just checking.	
9	Because I said "objection" earlier.	
10	I just wanted to make sure.	
11	THE WITNESS: Oh.	
12	That's the vibe like a woman	
13	knows when a guy is like creepy, and	
14	that's Gregg.	
15	BY MR. CAVALIER:	
16	Q. So is it fair to say then that the	
17	basis of your conclusion that Gregg was	
18	looking to get with you was your own	
19	intuition?	
20	MR. CARSON: Objection.	
21	Mischaracterization of prior	
22	testimony. You can answer.	
23	THE WITNESS: I'm thinking.	
24	I'm not not answering. I'm thinking.	

		Page 159
1	MR. CARSON: Take your time.	
2	THE WITNESS: My own intuition?	
3	Well, of course there is intuition	
4	there, but it was also like the way	
5	he was looking at me, the way that	
6	he, you know, was behaving. Like we	
7	were it was definitely like Gregg	
8	was on a mission to get laid.	
9	Like there was a girl at the	
LO	one event, I don't remember who it	
1	was, she had dark hair and she was	
L2	sitting like, she was sitting with	
L3	Gregg and she was like and it was	
L4	clearly like he was trying to kind of	
L5	offer her a job or I forget what	
L6	the nature of it was, but Gregg	
L7	clearly in his mind you could tell	
18	wanted to get laid. He was like	
L9	hitting on her, and he asked me if I	
20	thought she was hot, whatever. And	
21	then I and then like it was his,	
22	it was like his mission.	
23	And I don't think it was just	
24	me. I think it was like whatever	

		Page 160
1	girl was available. That's why I	
2	think that he grabbed Tricia the way	
3	he did. Like that, it was like Gregg	
4	was out, he was partying, he wanted	
5	to get laid, and I was just making	
6	sure everybody in the room knew that	
7	wasn't me.	
8	BY MR. CAVALIER:	
9	Q. Okay. But	
LO	A. And Matt would tell me, like Matt had	
L1	told us before any of this went down, like	
L2	Matt would say that him and Gregg were wild	
L3	when they would go out. He's like, "Last	
L4	AIPAC was wild. We were like banging chicks	
L5	and drinking all night and doing all kinds of	
L6	crazy stuff", and Matt said like when they	
L7	would go out to California together they	
L8	would do all that.	
L9	Like it was like you know like it	
20	was very much like you could feel it, like	
21	not just intuition but like the way he was	
22	acting, the words that he was using, his	
23	tone, his demeanor, the way he carried	
24	himself, the way he spoke to other women, the	

```
Page 161
1
     way he was. He was just like a big, gross,
2
     drinking Gregg wanting to have sex, and no, I
3
     don't think he was drunk.
4
             Have you ever gone out with friends
      Ο.
5
     of yours and observed them to be trying to,
6
     for lack of a better word, get laid?
7
                   MR. CARSON: Objection.
8
                   THE WITNESS: Yes.
     BY MR. CAVALIER:
9
             That's not uncommon among friends,
10
       0.
11
     correct?
12
                   MR. CARSON: Objection.
13
                   THE WITNESS: It's not uncommon
14
            among friends, no.
15
     BY MR. CAVALIER:
16
             So, given the social nature of the
17
     situation that you guys were in at a bar, is
18
     it possible that Gregg was just treating you
19
     as one of the guys in the group?
20
      Α.
             No.
21
             Why?
       Q.
22
       Α.
             Why? Because, A, Gregg has always
23
    been like looking at me like I was not one of
     the guys of the group, the way he looks at
24
```

		Page 162
1	me, talked to me, made me look at his	
2	Facebook friends and, you know, like say he's	
3	banging them. I mean it was constant,	
4	constant sexual innuendo from Gregg all the	
5	time.	
6	And that goes back to my Raheem	
7	thing. Like why didn't you want him there?	
8	Right, the guy I was hanging out with all	
9	night, that's the only one you don't want to	
LO	come back to the house. Come on. Any	
L1	let's be real here.	
L2	Q. Well, have you ever talked to any of	
L3	your friends about guys you found attractive?	
L4	A. My friends, yes. Not at work.	
L5	Q. And have your friends	
L6	A. It's not a boss here. Like are you	
L7	forgetting that he's my boss? He's not my	
L8	friend. He is the director of The Middle	
L9	East Forum. He is the head honcho.	
20	Like no, that's so inappropriate and	
21	it's so unwanted and it's so unwarranted.	
22	It's gross. And Gregg is not my friend.	
23	He's not my friend. He's the boss, and he	
24	should know that he's the boss.	

		Page 163
1	Q. Is Vasili's relationship with Skye	
2	inappropriate?	
3	A. Yes, technically. But she see,	
4	he's not Skye, albeit his assistant, is	
5	not Vasili's employer, David Snyder is, who	
6	runs the team, and she assists everybody on	
7	the team. She is not Vasili's boss.	
8	Q. But they're co-workers?	
9	A. Yes.	
10	Q. Can somebody be both a boss and a	
11	friend?	
12	A. If	
13	MR. CARSON: Objection.	
14	THE WITNESS: If you want it to	
15	be that way. Did I want Gregg Roman	
16	to be my friend, no.	
17	BY MR. CAVALIER:	
18	Q. Did you ever tell him that?	
19	A. What, that I don't want to be friends	
20	with him?	
21	Q. Yes.	
22	A. No. Why would I tell him that? He's	
23	the head guy who's manipulative and freakin'	
24	mean-spirited and vengeful. No, I'm not	

		Page 164
1	going to tell that guy I don't want to be his	
2	friend. What are you, crazy?	
3	Nobody wants to be his friend. He	
4	doesn't have any friends.	
5	Q. So you make the comment. Raheem	
6	comes up.	
7	A. Uh-huh.	
8	Q. Who's there in the room at that	
9	point?	
LO	A. Pinsker kids, I think another person	
L1	I'm not 100 percent sure, Marnie, Matt,	
L2	Gregg, me, Tricia. That's it.	
L3	Q. And did the physical contact happen	
L 4	with all of those people in the room?	
L5	A. The Pinsker kids were getting up and	
L6	saying their goodbyes, yes.	
L7	Q. Okay. And so describe the physical	
L8	contact that you're complaining of.	
L9	A. Like big, Gregg take his big	
20	wingspan, I'm over here, grabs me like this	
21	like from my shoulder like into him, so I'm	
22	like this now. Like can you see what I'm	
23	doing? I'm like leaning, right. He grabbed	
24	me like this into him, and then the other	

		Page 165
1	hand takes Tricia and basically by her bottom	
2	half and sticks it on her lap.	
3	Q. How did you know that his hand was	
4	around her bottom half?	
5	A. I could see him. I'm going like	
6	this.	
7	Q. Okay.	
8	A. I was halfway in his lap.	
9	Q. Did you feel like that conduct was	
10	sexual in nature?	
11	A. Yes.	
12	Q. Why?	
13	MR. CARSON: Objection. You	
14	can answer.	
15	THE WITNESS: Because it was.	
16	You don't, you don't grab I've	
17	never grabbed my friends like that.	
18	No friends of mine have ever grabbed	
19	me like that.	
20	BY MR. CAVALIER:	
21	Q. Well, I'm assuming you've given hugs	
22	to your friends, correct?	
23	A. That was not a hug. That was a pull	
24	you into me move. That was not a hug.	

			Page 166
1	Q.	Did he kiss you?	
2	А.	No.	
3	Q.	So I'm not understanding the	
4	distin	ction. Can you help me with that?	
5	A.	What do you mean? He pulled me into	
6	him in	like a gropey, unwanted way. It was	
7	sexual	in nature, and he said, "No other men	
8	need to	o be in this room". That's sexual.	
9		What does men being in a room, other	
LO	than y	ou and you pulling me into you, I mean	
L1	that's	not, that's not a friendly gesture,	
L2	it's n	ot a friendly statement, it's not	
L3	anythi	ng like that. That is an unwanted	
L4	sexual	advance.	
L5	Q.	I'm not trying to be difficult.	
L6	Α.	Yes, you are.	
L7	Q.	No, I'm really not, but	
8		MR. CARSON: Objection.	
L9		THE WITNESS: That's your job.	
20		Don't think I'm fooled by your like	
21		nice guy routine. I know what your	
22		job is, and your job is to	
23		MR. CARSON: There's no	
24		question pending.	

		Page 167
1	THE WITNESS: make me very	
2	uncomfortable and catch me in stuff.	
3	So it's not going to happen because I	
4	only tell the truth.	
5	MR. CARSON: There's no	
6	question pending.	
7	BY MR. CAVALIER:	
8	Q. I'm not trying to be difficult.	
9	A. Yes, you are.	
10	MR. CARSON: Okay. Thank you,	
11	Jon.	
12	BY MR. CAVALIER:	
13	Q. What you're describing to me sounds	
14	like a hug.	
15	A. Would you feel comfortable, would you	
16	feel comfortable excuse me.	
17	MR. CARSON: Lisa,	
18	THE WITNESS: Would you feel	
19	comfortable if you had a daughter and	
20	said her boss did that to her? Would	
21	you, would you like that? Would you	
22	think that that was sexual in nature?	
23	Or is it just because it's me that	
24	you don't think so or because you're	

```
Page 168
1
            his lawyer?
2
     BY MR. CAVALIER:
3
       O.
             I'm trying to find out what this is.
4
                   MR. CARSON: I didn't get my
5
            objection, I didn't get my objection
6
            on the record for the last question,
7
            so I'm objecting.
8
     BY MR. CAVALIER:
9
             I'm trying to find --
       Q.
10
                   MR. CARSON: Keep --
11
                   MR. CAVALIER: I'm sorry, Seth.
12
            Go ahead.
13
                   MR. CARSON: No, keep going.
14
            just wanted to state an objection.
15
            That's all.
16
     BY MR. CAVALIER:
17
             I'm trying to find out what this is.
             It was sexual in nature. I said it
18
       Α.
     four times, and if you want me to repeat it
19
20
     again, he said, "There doesn't need to be
21
     any, another man in the room". He grabbed
22
    me, pulled me into him, and was creepy Gregg
23
     sexual. It's not a hug. You don't hug your
     employees. He's my boss. He shouldn't be
24
```

```
Page 169
 1
     touching me at all.
 2
             That's not --
       Ο.
 3
       Α.
             Get it through your head. It's
 4
     wrong, it's inappropriate, and you know it, I
 5
     know it, the whole world knows it.
 6
             That's not what I'm asking you. I'm
       Ο.
 7
     just --
 8
       Α.
             It's not a hug. It was sexual in
     nature. That's what you asked me, and I'm
 9
10
     answering.
11
             A hug can be sexual in nature.
       Ο.
12
             It wasn't -- I'm telling you right
13
     now it was gross. That's what it was.
14
             I'm not disputing your, the way
       Ο.
     you're describing it, but I'm trying to, I'm
15
16
     trying to figure out exactly when you say,
17
     when you say that he pulled, he pulled you
18
     into him and wrapped his arms around you?
19
       Α.
             His one arm.
20
       Ο.
             His one arm.
21
             And whispered in his creep Gregg
       Α.
22
     voice that --
23
       Q.
             Okay.
             -- "there shouldn't be any other men
24
       Α.
```

		Page 170
1	in this room". That was so sexual. You	
2	couldn't even there's nothing else it	
3	could be. And that's not intuition. That's	
4	facts.	
5	Q. Fine. Fine.	
6	A. And he admitted to doing it to his	
7	boss, who did nothing about it.	
8	Q. I understand.	
9	A. He's working there. He's a creep.	
LO	Q. I understand that. What I'm trying	
L1	to get you to detail is exactly what the	
L2	nature, not the nature but the details of the	
L3	physical	
L 4	A. I just said it to you. He grabbed	
L5	me, put his big,	
L6	MR. CARSON: So, Lisa,	
L7	THE WITNESS: disgusting arm	
L8	around me, grabbed my arm, pulled me	
L9	into him so my head is basically in	
20	the middle of his chest area, let's	
21	get as descriptive as possible, so	
22	that my head is in the, near his,	
23	under his right breast, okay, in	
24	between his bellybutton and his	

			Page 171
1		breast, okay, pulls my head there, so	
2		now I'm looking either down at his	
3		penis or I'm looking down at him with	
4		his hands under Tricia's ass on his	
5		lap. That's what I was looking at.	
6		So yes, the whole thing was	
7		sexual. I don't know how much more	
8		detail you need. That's what	
9		happened.	
10	BY MR.	CAVALIER:	
11	Q.	Okay. And at which point did he make	
12	the cor	mment to you?	
13	Α.	While my head was stuck there.	
14	Q.	How long was your head stuck there?	
15	Α.	Probably like, I don't know, let's	
16	count,	let me just do six seconds until I	
17	like go	ot enough muster up to pull away.	
18	Q.	Okay. So you pulled away?	
19	Α.	Uh-huh.	
20	Q.	Then what?	
21	Α.	And then I got up and went into the	
22	kitche	n.	
23	Q.	And did what?	
24	Α.	Talked to Matt.	

			Page 172
1	Q.	About what?	
2	Α.	I don't remember.	
3	Q.	Did you tell Matt what happened with	
4	Gregg?		
5	Α.	I tell I told Matt. Yes, we	
6	talked	about it the next day. I said, "Gregg	
7	was cre	epy all the time", and then he's like,	
8	"That's	funny that you say that because"	
9	that's	when he told me that Gregg said the	
LO	thing a	bout his assistant giving good blow	
L1	jobs.		
L2		Yes, I told Matt. Guess what? Matt	
L3	was a d	lirector too. Did he do shit, nope.	
L4	Q.	So that comment about his assistant	
L5	giving	blow jobs, Gregg never made that	
L6	comment	to you?	
L7	Α.	He made it to Matt.	
L8	Q.	You didn't hear it?	
L9	Α.	I did not hear it.	
20	Q.	Okay. Matt told you about it,	
21	correct	?	
22	Α.	Correct. But how convenient, how	
23	conveni	ent that when we go to Israel the	
24	thing t	hat he's pushing is good blow jobs.	

Page 173 1 That's rich. 2 So I don't understand that. What do Ο. 3 you mean by that? 4 So, when we go to Israel weeks later, 5 he's like, "I just need a good blow job. I 6 just need a good blow job. I just need a 7 release. You know, don't you think I deserve 8 a release"? Ugh. 9 Do you think Gregg had a lot of power 10 over you? 11 Yes. He did. He's the whole Middle Α. 12 East Forum. He's my boss. 13 Think about it. I love the work that 14 I'm doing, right, like the mission. I love 15 my kids. It's hard to get a job in Philly, 16 right. My kids, I want to spend time with 17 them. I don't want to be halfway two hours away in D.C. I want to be with my children. 18 19 I want to be with my family. There's no 20 political jobs. Of course I'm going to do 21 everything I can to keep my job and keep 22 doing the good work of the freakin' Middle East Forum. 23 24 Q. Do you think that --

Page 174 1 Yes. He had, he had tons of power Α. 2 over me, tons, too much actually. 3 Do you think Gregg knew all of that? 0. 4 Α. Of course he did, yes. We would talk 5 I talked about it with them in my about it. 6 interview. I said, "I want to be close to my 7 kids, I want to be with my family, and there 8 are no conservative political jobs here". I said it in my interview. Of course he knew. 9 Did --10 Ο. 11 Yes, Gregg knows who he has power Α. 12 over, just like he did with Alana, "Oh, I 13 won't give you that New York Times story unless, you know, you come up to my room", 14 15 embarrassing her in front of people, whipping 16 his penis out and pissing on a wall. Ew, the 17 man is a predator. Did he ever outright ask you for a 18 blow job? 19 20 Α. Yes. 21 When and how? Q. 22 Α. In Israel. 23 What did he say? Q. He said, "Don't I just need a 24 Α.

```
Page 175
1
     release? Don't I deserve a release? Come
2
     on, Lisa. You can give me a release". I
3
     said, "No, Gregg, stop being gross".
4
             And I got a knife and I went -- and I
5
     got a knife from the kitchen because he went,
6
    he came home twice. So he came into Israel,
7
     right, he came home drunk once that I didn't
8
     go out because I had work to do and I don't
     freakin' drink like that. So he came out,
9
     right, and he came back and he was like that
10
11
     and he said he couldn't get laid by Lea, she
12
     turned him down or whatever. Then he went
13
     out again to go try to get laid again when it
     didn't work the first time, and then he came
14
15
     back a second time and was doing it even
16
     more.
           The dude is gross.
17
             Are you paraphrasing his words to you
18
     or are you quoting him?
19
             I'm quoting him. I remember that day
       Α.
     like it was yesterday. I remember what side
20
21
     of the couch I was sitting on. It was
22
     shocking.
23
             So he said to you, "Don't I deserve a
     release"?
24
```

		Page 176
1	A. Uh-huh.	
2	THE COURT REPORTER: Yes?	
3	BY MR. CAVALIER:	
4	Q. Yes?	
5	A. He said, "I work hard. I know I have	
6	a wife. We don't really get along", blah,	
7	blah, blah, blah. She wasn't hot. I	
8	shouldn't have married her, but I was young	
9	and she was Israeli and I thought it was the	
LO	right thing to do. And since then, I've been	
L1	fucking Lea". He was talking about Lea's	
L2	body and how she was so hot and she was a	
L3	dancer and she was on top of him. Like I	
L 4	don't need to hear all that.	
L5	Q. Sitting here today, do you	
L6	specifically, and under oath, do you	
L7	specifically remember Gregg Roman saying to	
L8	you, "Can't you just give me a release"?	
L9	A. Yes.	
20	Q. Do you know why you wouldn't have	
21	alleged that in your Complaint?	
22	A. Didn't I?	
23	MR. CARSON: Objection. The	
24	witness did not draft the Complaint.	

```
Page 177
1
                   THE WITNESS:
                                 Isn't that in the
2
            Complaint?
3
     BY MR. CAVALIER:
4
            Not to my knowledge.
       Q.
5
             Well, it should be.
       Α.
6
             Okay.
      Ο.
7
                   MR. CARSON: Objection.
8
     BY MR. CAVALIER:
9
             Did you -- let's go back since you
     jumped ahead to Israel there. In the kitchen
10
11
     after the physical contact, did you tell Matt
12
     Bennett what had just happened with Gregg
13
     Roman?
14
             I don't know if I told him right
       Α.
15
            That night is like -- I told you I was
16
     exhausted that night. We had been, we
17
     travelled down from D.C. and we were out all
     day and all night, and I was walking around
18
19
     in five-inch high heels all night. I was
20
     tired. I don't really remember. I just
21
     wanted to go to bed, I remember that, and I
22
     couldn't leave and I just wanted to go to
23
     bed, so I curled up on the couch and I fell
     asleep.
24
```

		Page 178
1	Q. Were you afraid?	
2	A. Not afraid. There was 100 people	
3	there. That was an exaggeration clearly,	
4	100, but there were like, you know, six,	
5	seven people, five people there, I don't	
6	know.	
7	At that, like by the time I curled up	
8	on the couch, it was Marnie, Tricia, me,	
9	Matt, Gregg, five. So, like besides Gregg,	
LO	like those four people wouldn't let anything	
L1	happen to me. And Matt wouldn't really let	
L2	any-, I don't think Matt would have let	
L3	anything happen to me. I know Marnie sure as	
L4	hell wouldn't have, and I know Tricia	
L5	wouldn't have.	
L6	So no, I was not afraid. I was	
L7	afraid when I was alone and with him in	
8.	Israel.	
L9	Q. Were you uncomfortable at that point	
20	in time?	
21	A. Yes.	
22	Q. Why?	
23	A. Because I didn't want to be there,	
24	Number 1. Number 2, I was like forced to be	

```
Page 179
1
     there. Number 3, Gregg was just sexually
2
     inappropriate with me and he was being weird
3
     with the whole Raheem thing. I just wanted
4
     to go bed. So yes, I was uncomfortable.
5
             Well, let's back up a little bit.
6
     When you say you were forced to be there, --
7
             Yes, Gregg made me get in the SUV. I
       Α.
8
     said I wanted to go home like ten times.
     He's like, "No, you're staying. You guys are
9
     staying".
10
11
             Let's be clear. He didn't physically
       Ο.
12
     force you to be there, correct?
13
             No, he did not physically force me.
14
                   MR. CARSON: Objection.
                   THE WITNESS: But like he's my
15
16
                   I prefer not to piss him off
17
            and be in trouble the next day and
            have him treat me bad.
18
     BY MR. CAVALIER:
19
20
             He told you --
       Ο.
21
                   MR. CARSON: And just for the
22
            record, objection to the last
23
            question.
24
     BY MR. CAVALIER:
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```
Page 180
1
       Q.
             He told you --
2
                   MR. CARSON: Maybe just slow up
3
            a little bit, Lisa, just so I get my
4
            objections in. That's all.
5
                   THE WITNESS: Sorry.
6
     BY MR. CAVALIER:
7
             He told you he wanted you to be
       Ο.
8
     there, correct?
             Yes. He said, "You're staying here",
9
       Α.
10
     yes.
11
             And you interpreted that as an
       Ο.
12
     instruction?
13
             Correct. This isn't a hanging out
     situation. It's a work situation. The whole
14
15
     thing was a work event. Every event, every
16
     bar that we went to or whatever, they were
17
     work.
18
             Like it was like a host company, like
     a -- Camera, whatever that stands for, I
19
20
     can't remember off the top of my head, but
21
     they were like hosting a pa-, like a
22
     reception at a bar. Every one we went to was
23
    work related, and then he had work people
    back at the thing. He was telling me I had
24
```

```
Page 181
 1
     to be there.
 2
             It's a common thing in this business
       Ο.
 3
     to be working in social situations, correct?
 4
       Α.
             Yes.
                   I do it now.
 5
                   MR. CARSON: Objection.
 6
                   THE WITNESS: But that doesn't
 7
            mean it's a social event. It's still
 8
            a work event that is by nature
            social. But it is not, it is not a
 9
            social event. That is not the prime
10
11
            objective of the night.
12
     BY MR. CAVALIER:
13
             So what you're saying is --
             He was acting as my boss all night.
14
15
     He was not acting as my friend. It was a
16
     work function.
17
             So, if he was acting as your boss all
     night, is it also fair to say that you were
18
19
     working all night?
20
             Yes, pretty much.
       Α.
21
             So you sleep on the couch at the
       Q.
22
     Airbnb. Did anything else happen that night?
23
       Α.
             I was asleep.
24
             That's a "no"?
       Q.
```

Page 182 1 It's a "no". I mean I was asleep. 2 If it did, I don't know, but I -- because I 3 was asleep. I don't know if anything 4 happened with other people there, but I was 5 asleep. 6 Did you notice --Q. 7 I'm sure other stuff happened because Α. 8 people stayed up. I don't -- you know what I mean? Like, I don't know, did somebody go to 9 the bathroom? I'm sure that did happen. 10 11 Something happened. I don't know, I wasn't 12 there. 13 Ο. Did anything more happen to you? No, nothing happened to me. 14 Α. Did you observe Gregg having physical 15 Ο. contact with anyone else throughout the 16 17 night? 18 Other than when he touched Tricia, Α. 19 no, but him and Marnie did going into the 20 bedroom. I don't know what they were doing 21 back there. I don't know happened in that 22 situation, but I saw that happen. 23 How long were they in the bedroom? Q. Five minutes. It was like when we 24 Α.

		Page 183
1	first got there, I think.	
2	Q. So you wake up in the morning on the	
3	couch at the Airbnb the next day?	
4	A. And I said, "Can we all get out of	
5	here, please", and then we all got in an Uber	
6	I think and went back to our hotel. I don't	
7	really remember, but yes.	
8	Q. What happened with the rest of the	
9	trip? Anything of note?	
LO	A. No. We all went home.	
L1	Q. Okay. So you get back from AIPAC.	
L2	Did you ever confront Gregg about what	
L3	happened in D.C.?	
L4	A. No. Why would I? He's my boss. He	
L5	doesn't like what I say, I'm fired.	
L6	Q. Did you ever tell him that he made	
L7	you feel uncomfortable?	
L8	A. No. That would only, that would only	
L9	like make Gregg angry and mean and vengeful.	
20	Q. Did you ever tell him that you didn't	
21	like being touched by him?	
22	A. No. Who is going to say that to	
23	their boss, "Please don't touch me"?	
24	Q. Did you ever tell him that he made	

Page 184 1 you feel uncomfortable in social situations? 2 How could he not tell when I jerked 3 myself away from him? 4 Did you ever verbalize to him that Ο. 5 you were uncomfortable with him in social 6 situations? 7 Α. No. Should I need to? I mean, like 8 if somebody punches you in the face, you know 9 that's inappropriate, do I need to tell them that that was wrong that they punched me in 10 11 the face? 12 Did you ever tell him not to touch Ο. 13 you anymore? 14 Should I tell people not to tell Α. me not to -- please don't punch me in my face 15 16 I mean, like you know it's wrong, anymore? 17 right? 18 Did you ever tell Daniel Pipes that Ο. you were uncomfortable with Gregg Roman? 19 20 I hardly ever saw Daniel Pipes. Α. 21 Daniel Pipes would come into the office maybe 22 once a month to pick up his mail, he'd sit in 23 his office, he may come in my office and put a thing on my desk to fax. 24

			Page 185
1		I think I had, I think of the hours	
2	of time	e I talked to him before the, like when	
3	Marnie	went to him with all of our complaints	
4	and eve	erything that happened, I probably had	
5	talked	to him for a total of 20 minutes,	
6	includi	ing my interview with him.	
7	Q.	Did you have his phone number?	
8	А.	He's non-existent. Gregg is Gregg	
9	runs ev	verything.	
LO	Q.	Did you have his phone number?	
1	Α.	No.	
L2	Q.	Did you have his e-mail address?	
L3	Α.	Yes.	
L 4	Q.	So you at least knew how to contact	
L5	him?		
L6	Α.	I did.	
L7	Q.	Prior to	
L8	Α.	It wouldn't matter anyway. Gregg	
L9	runs th	ne whole thing. Gregg is the MEF. It	
20	is Greg	gg. Even when, even when Daniel ousted	
21	him, he	e was still giving Gregg advice. He	
22	was sti	ill running the show. He was still in	
23	charge	of everything. He was still in charge	
24	of the	finances.	

Page 186 1 He was hiding things from Daniel 2 Pipes, including that he was paying our, half 3 of our insurance or that he spent \$400,000 on 4 a website that had nothing happen. I saw him 5 lie to Daniel Pipes about donors. Telling 6 Daniel Pipes isn't going to do anything. 7 Did you ever go to HR at this point Ο. 8 in time? Marnie is HR. And I did tell her 9 Α. when I came back from Israel, well, I 10 11 attempted to tell her, but then it got 12 awkward and then I didn't say anything. I told Matt. I felt comfortable enough with 13 14 Matt. 15 Because Marnie and Gregg were like, were like two little peas in a pod kind of 16 17 thing. Like Marnie, when Gregg would do things wrong, Marnie would like stick up for 18 19 him, and like I never understood that, like I 20 never got it. And that's a lot of the reason 21 why Marnie and I didn't get along for the 22 very first part of like the whole first year. I mean Marnie and I were not like -- we 23 butted heads all the time, and it was because 24

		Page	187
1	she had this weird thing with Gregg and I		
2	didn't trust her one bit.		
3	Q. Is she a trustworthy person?		
4	A. Yes. Marnie is loyal. And see, and		
5	that's what she was doing. She thought she		
6	was being loyal to Gregg, to her boss.		
7	So yes, Marnie is definitely		
8	trustworthy. It depends on, you know, it		
9	doesn't depend. I mean, if she's on your		
10	side, you know, she's like, you know, you can		
11	trust her with her life, you know. And		
12	that's what, she thought that Gregg, I don't		
13	know what she thought he was, but she hitched		
14	her wagon to him.		
15	Q. But we don't know how she would have		
16	reacted to her, to you telling her about		
17	this, right?		
18	A. No. But I was, I was too nervous to		
19	find out. I didn't want to lose my job.		
20	And then again, here's another thing,		
21	I'm I consider myself, and I told you		
22	this, you've heard this before, I'm a strong,		
23	independent woman. I consider myself like		
24	you know, you asked if I was capable super		

Page 188 1 capable, right, and I -- always, people would 2 always say like, "Lisa, you're like one of 3 the strongest women I know", right. There's 4 something that I am. 5 So I will -- I was willing, like not 6 willing but like I was enduring, I figured I 7 can endure this, it's fine, it's just 8 another -- it's just something for me to overcome. Like I will sacrifice how I feel 9 in this situation for my kids, for my family, 10 11 for the mission, for anything, like for the 12 right things, for the good cause. So it was 13 a matter of just sit and endure it, you know. 14 I'm a conservative woman. Like I told you, I'm not out, going to be out 15 16 running around being like, "Ah, I'm a woman, 17 and therefore, I'm vulnerable". I'm not like that. I am on equal playing field when I 18 19 walk into any room with any man. And so 20 that's not -- I don't do the victimhood 21 mentality thing. That's not my style. 22 That's not who I am. So I'm not going to go 23 play victim. Do you know what I mean? Like 24 I'm just not, I'm not that person.

Page 189 1 It got -- it's just the problem with 2 Gregg it was just so intense and it wouldn't 3 stop and it was forever that I finally felt 4 like I needed to protect myself, and that's 5 why I went to a lawyer because I needed to 6 protect myself. That is the only reason. 7 0. Okay. So let's talk about Israel. 8 Α. Let's talk about Israel. 9 Ο. How did your participation in that 10 trip come about? 11 Apparently, Gregg asked Marnie to go. Α. 12 The whole thing was weird about why he wanted anybody to go anyway, right. He wanted 13 14 Marnie to go. First, he asked Marnie to go, 15 and she said no because she's a single woman 16 and she wanted her own hotel room, right. 17 And Gregg was like, "No, we're not doing that", whatever. 18 19 So then he asked me to go, right, and I was like, "Well, I've never been to Israel. 20 21 Of course I want to go see freakin' Israel. 22 I want to go to the Knesset. I want to do 23 all these cool things. Yes, I'll go". So he's like, "Okay. Well, I'll have you work 24

```
Page 190
1
     on this like Little Project", or whatever,
2
     some sneaky project he was doing, Saudi
3
     thing, I don't know, right, and so -- well, I
4
     do know like some of it but I don't really
5
     recall all the details, but I don't know who
6
    hired him or any of that stuff. All I know
7
     it was called the Little Project and it was
     about like influencing people on how to do
8
     it.
9
             So he claimed that like he was
10
11
     bringing me because you weren't supposed to
12
     like do that stuff on American soil and I can
13
     help him with the PowerPoint presentation and
     whatever. But then why would you ask Marnie
14
     to go? I didn't think about this until
15
16
     later. Like why would you ask Marnie to go?
17
     She don't do PowerPoint presentations, right.
     Like what do you need somebody to go with you
18
19
     on that trip for? I didn't think about it.
20
     I said, "I want to go to Israel. I've never
21
     been there".
22
             I had never travelled much at all.
                                                  Ι
23
     didn't go on my first airplane until I was
     25-years old and I went, you know, Vasil-, my
24
```

		Page 191
1	husband took me to Paris. But like, you	
2	know, I'm not well-travelled, and I always	
3	wanted to be. So why not jump on an	
4	opportunity to prove to my boss that I can be	
5	flexible, I can travel, and I can get work	
6	done that he needs and be involved? Of	
7	course I would want to go on that trip.	
8	Q. So the first person that he asked to	
9	go on the trip was Matt Bennett, right?	
LO	A. First that I know he asked was	
L1	Marnie.	
L2	Q. Okay.	
L3	A. I didn't know about him asking Matt.	
L 4	Q. So, when you heard that this trip was	
L5	happening and found out that Marnie did not	
L6	want to go, did you go to Gregg and tell him	
L7	that you wanted to go? Did you express	
8	interest?	
L9	A. Yes. Well, he said, "Do you want to	
20	go"? I said, "Hell, yes, I want to go. I	
21	want to go. Let me go".	
22	Q. Okay. After what happened at AIPAC,	
23	you weren't concerned about what you just	
24	described to me as all of his creepy	

Page 192 1 behavior? 2 It's creepy behavior. But like I Α. 3 said, I'm strong, I can handle that stuff, 4 and normally, I could. I didn't think that 5 he would be as crazy as he was in Israel. I 6 never thought that. Because I've never 7 experienced anything like this. 8 I've never had bosses talk to me like I've never had co-workers treat me 9 like this. I've never had any of that in my 10 11 whole life, and I worked in Congress where 12 apparently that's supposed to be rampant. 13 mean I was an intern down there mingling with 14 all people. Nobody ever, ever, ever was like 15 this with me in a work environment, ever. 16 I understand. But at the same time, Ο. 17 I mean you just --18 I just told you I'm strong, didn't I? Didn't I just tell you that I would do it and 19 20 I wanted to go to Israel? Didn't I just tell 21 you that the reasons that I thought I could 22 handle myself because I didn't expect Gregg to be like that? So he looks at me --23 You did. 24 Q.

		Page	193
1	A. So he looks at me creepy here and		
2	there, right. Like okay, well, then let me,		
3	let me, you know, tell him it's not cool and		
4	get work done. Maybe if he sees me as an		
5	equal, he'll start treating me with some		
6	respect. Maybe if I show him what a good job		
7	I do here in Israel and how professional I		
8	can be in front of members of the Knesset,		
9	then he'll have some respect for me.		
10	You don't see how anybody would think		
11	that?		
12	Q. Is it fair to say then that what		
13	happened at AIPAC didn't bother you that		
14	much?		
15	A. Oh, it bothered me.		
16	MR. CARSON: Objection.		
17	THE WITNESS: Wait a minute.		
18	It bothered me, okay, that much at		
19	the time, right. But, you know, I		
20	chalk it up to, okay, maybe he's		
21	drinking, he was smoking pot, maybe		
22	he's high, right.		
23	Like it bothered me, very much		
24	it bothered me, very much it bothered		

		Page 194
1	me. But did I think that it would be	
2	an ongoing thing? No. Because who	
3	does that? Who acts like that?	
4	BY MR. CAVALIER:	
5	Q. So	
6	A. And it was an ongoing thing.	
7	Q. So, even though you had this	
8	interaction with him with other people around	
9	that you consider sexual in nature and it	
10	bothered you,	
11	A. I've never had anybody be like that,	
12	so I don't so I did not	
13	MR. CARSON: Lisa, let him	
14	finish the question.	
15	THE WITNESS: And I was	
16	being excuse me. You asked me a	
17	question. I'm finishing.	
18	BY MR. CAVALIER:	
19	Q. It's not me interrupting you.	
20	MR. CARSON: No, there's no	
21	question that's asked. So you know	
22	what he's asking you?	
23	THE WITNESS: I'm sorry. Say	
24	that again. Say it all over again.	

		Page 195
1	Go.	
2	BY MR. CAVALIER:	
3	Q. My question is: You just described	
4	to me a physical interaction with Gregg at	
5	AIPAC that you considered sexual and very	
6	uncomfortable?	
7	A. Correct.	
8	Q. That occurred with multiple other	
9	people around?	
LO	A. Correct.	
L1	Q. And it's part of your Complaint in	
L2	this case?	
L3	A. Correct.	
L4	Q. But then a month later, you	
L5	enthusiastically join him one-on-one on a	
L6	trip to a foreign country where you'd be	
L7	staying in the same building at least?	
L8	A. Correct.	
L9	Q. And what I'm trying to understand is	
20	how you square those two things.	
21	A. Because, A, I didn't think that there	
22	would be any drinking involved in the trip.	
23	B, I trusted Gregg that he wouldn't be you	
24	know, like I didn't think, I don't, I didn't	

Page 196 1 think that this would happen again. I 2 thought this was like a one-time weird Gregg 3 moment. It wasn't. It turned out it wasn't. 4 I was being naive. 5 But you also told me that Gregg was 6 constantly weird? 7 He was constantly weird. But men are Α. 8 constantly weird with me all the time, just never my bosses. Do you know how many guys 9 hit on me a week? No offense, like I'm 10 11 not -- I'm not saying like I'm this most 12 beautiful girl in the world, but like men are 13 constantly looking at me like that. I can --14 like I said, I went to the gas station the 15 other day, the 7-11 the other day. The guy 16 was like, "Nice dress". I mean people are 17 always leering at me. Yes, it happens. 18 Should it happen in your work environment, 19 should it make you uncomfortable, should it 20 affect your work product, should it affect 21 your home life and your mental instability, 22 no. 23 Most men look at me. So I figured that he was one of those most men and I would 24

		Page 197
1	just deal with it. I didn't think that he	
2	would solicit me for blow jobs, put his foot	
3	up my ass, and like say things that aren't	
4	inappropriate and make me actually nervous	
5	and scared. And no, I didn't think that he	
6	would be out drinking. It's not like it was	
7	a work thing. I didn't we weren't	
8	supposed to be entertaining anybody. I	
9	didn't think he'd be drinking.	
LO	And the first night I chalked it up	
L1	to, okay, A, Gregg is creepy all the time; B,	
L2	this is an isolated incident because he was	
L3	drinking or high or whatever his excuse was.	
L4	And like I said, I didn't think he was drunk,	
L5	but he was definitely drinking and he was	
L6	definitely freakin' smoking pot.	
L7	Q. But I don't understand	
L8	A. I didn't think that any of that would	
L9	happen now.	
20	Q. So you just said he's creepy all the	
21	time but this was an isolated incident?	
22	A. The physical element of it was an	
23	isolated incident.	
24	Q. Okay.	

Page 198 1 Α. That's what I thought. 2 Ο. Okay. 3 I thought that that was a one-time Α. 4 thing that he wouldn't do it again, that it 5 was an isolated incident. That's what I 6 thought. I believed that. 7 Because I don't believe that most 8 people are creepozoids like Gregg Roman. Because that's not -- like that would be 9 thinking that everybody is like a terrible 10 11 person, and I don't believe that about the 12 human race. 13 Ο. So --14 I didn't actually even believe that 15 Gregg was. I thought that he was, you know, 16 weird, sad, ugly and maybe needed attention 17 because he didn't get it when he was younger, I don't know. Like I didn't think he was a 18 19 bad, horrible human. 20 I thought that he was like okay, he 21 found me attractive, and when he was drinking 22 at an event and smoking pot, that he was, you know, doing whatever he was doing that night 23 and that I did not expect for that to happen 24

```
Page 199
1
     again. Because in what world would you think
2
     that that would happen?
3
             So, just to be --
       Ο.
4
       Α.
             I wouldn't. I mean, that's not in my
5
     world view. Is that in your world view that
6
     everybody is a sexual predator? Because it's
     not in my world view.
7
8
             My world view is not really relevant
       Q.
     right now.
9
10
       Α.
             Well, I just told you mine.
11
      Ο.
          So --
12
             You're going to ask me the same
      Α.
13
     question again?
14
       O.
             No.
15
                   MR. CARSON: Lisa, let him ask
16
            the question.
17
     BY MR. CAVALIER:
             Because the -- you categorized the
18
       Q.
19
     physical touching at AIPAC as a one-time
20
     incident at that --
21
             I thought, I said I thought it was
     going to be a one-time incident.
22
23
             Right. So --
       Q.
             And by the way, are you -- I just
24
       Α.
```

		Page 200
1	answered your question. Are you trying not	
2	to be difficult right now or are you	
3	purposely trying to be difficult?	
4	Q. I'm just trying to ask a question.	
5	A. Because the last time I couldn't	
6	remember.	
7	MR. CARSON: Just let him ask,	
8	and then you can answer.	
9	BY MR. CAVALIER:	
10	Q. Up until that point, was it in fact a	
11	one-time incident?	
12	A. The physical touching up until that	
13	point, yes.	
14	Q. So you arrive in Israel.	
15	A. And by the way, my mom, because I	
16	told her what happened at AIPAC, told me not	
17	to go to Israel with him.	
18	Q. Why?	
19	A. Because she saw the signs too. I was	
20	the one that was naive.	
21	Q. What did your mom say to you about	
22	Israel?	
23	A. She said, "Don't go. I don't think	
24	it's a good idea". She didn't trust him.	

		Page 201
1	Mother's intuition, I guess. Does that count	
2	as a thing, that kind of intuition?	
3	Q. But you ignored your mother's advice?	
4	A. I did ignore my mother's advice.	
5	I've done that a lot in my life, to my	
6	chagrin.	
7	Q. So you arrive in Israel. What	
8	happens when you land?	
9	A. Nothing. It's fine. Everything is	
LO	getting ready, like whatever. We get there	
L1	and he's like, "Oh, this place only has one	
L2	bathroom. I know I promised you your own	
L3	bathroom. I didn't know. That's like what	
L4	the advertisement said". I was like	
L5	"whatever" at that point.	
L6	Q. Did it bother you?	
L7	A. We were right in the kitchen.	
8	Q. Did it only have one bathroom?	
L9	A. It only had one bathroom, and he	
20	promised me two.	
21	Q. Did that bother you?	
22	A. Yes. I don't want to share a	
23	bathroom with him. I don't want to share a	
24	bathroom with any man to tell you the truth.	

```
Page 202
1
     Like what if I have to use the facilities --
2
             So --
       Ο.
3
       Α.
             -- in the middle of the hallway?
4
             -- did it make you sexually
       Ο.
5
     uncomfortable or was it annoying?
6
             Well, I had to shower right outside
       Α.
7
     his room, and I don't like to particularly
8
     put my clothes on wet steamy. I like to take
     my towel and like get in my room and then get
9
     dressed, but -- so now I had to like adjust
10
11
     myself because I didn't want to walk around
12
     in the ho-, in the room in a towel, yes. It
13
     was --
14
             It was annoying?
       Ο.
15
             -- uncomfortable. Of course it was.
       Α.
16
             That's what I'm trying to ask. Did
       0.
17
     you make that known that you had a problem
18
     with the arrangement?
19
                  I figured I'd deal with it. I'd
       Α.
20
     just get dressed in the steamy shower.
21
             So, when he said to you, "I'm sorry
22
     this place was supposed to have two
23
     bathrooms, it only has one, I know I promised
24
     you your own bathroom", --
```

		Page 203
1	MR. CARSON: Object to form.	
2	Assuming facts not in evidence. Go	
3	ahead.	
4	BY MR. CAVALIER:	
5	Q. Could you repeat	
6	A. In a way	
7	Q. Could you repeat to us what Gregg	
8	Roman said about the bathroom situation?	
9	A. He just said well, originally,	
10	when he said, he's like, "I got us an Airbnb	
11	because it's cheaper". He's like, "You'll	
12	have your own room and your own bathroom".	
13	And I was like, "Sold. I'm in. Fine".	
14	Q. Okay. So you get there, there's one	
15	bathroom. What did Gregg say?	
16	A. He immediately addressed it, which	
17	made me feel like like we just walked in	
18	like the door and there was like this French	
19	guy, he was pretty nice, and the French guy	
20	leaves maybe he wasn't French, but he was	
21	speaking French. Whatever. Maybe he was	
22	French, I don't know. Anyway, he leaves, and	
23	then that's like the first thing Gregg said.	
24	It wasn't like he even like toured around the	

```
Page 204
1
            It's like he knew. It's like ugh.
    place.
2
             Anyway, so that was uncomfortable,
3
    but that -- and -- but that was fine. We
4
     were there for a while.
5
             What did --
       Ο.
6
             And it wasn't until --
       Α.
7
             What did he say to you about the
       Ο.
8
    bathroom?
             He just said, "I'm sorry that there's
9
     one bathroom. I know I promised you that
10
11
     you'd have your own". And I was like
12
     "whatever". What am I going to say at that
13
    point?
           We're there.
14
             Okay. Okay. So then what happened?
       Ο.
             We went about our business. We went
15
16
     to the IDF. We went to the Knesset. I
17
     worked on like the Little PowerPoint
18
    presentation.
19
             He did tell me not to like put it up
     on Facebook or put it anywhere because he
20
21
     didn't want Daniel Pipes or his wife to know
22
     that I was there. I thought that was weird.
23
     And, accidentally, I slipped and said it to
     EJ, and I was like, "Uh, EJ, we're having the
24
```

		Page 205
1	project directors' call. Don't let anybody	
2	know that you know that I'm in Israel because	
3	Gregg doesn't want none of that". And he's	
4	like, "Why does he want to know that"? And I	
5	was like, "I don't know". So I thought that	
6	was weird.	
7	Q. When did he tell you that?	
8	A. He didn't want Daniel Pipes to know.	
9	He didn't want his wife to know.	
LO	And then like he would have, he would	
L1	like FaceTime his wife and his kids and like	
L2	make me go in his room, like not in his room,	
L3	my room. My husband, I would FaceTime my	
L4	husband out in the open, whatever. Like	
L5	everybody knows what I'm doing. That was	
L6	weird.	
L7	Q. When did	
L8	A. When I was on the project directors'	
L9	calls, he wanted me to pretend like I was	
20	still in the United States.	
21	Q. When did he tell you that you	
22	couldn't post anything on social media?	
23	A. Before we left.	
24	Q. Okay. So then you felt that was	

Page 206 1 weird? 2 Yes. I mean like why can't anybody Α. 3 know that I'm here? What's the problem? 4 Ο. Did you think he was trying to pull 5 something with you? 6 I didn't know what it was. I just Α. 7 thought it was weird. Like I don't sit there 8 and like analyze every second of everybody's 9 being, by the way. Like it's not like I'm sitting there thinking, "Ooh, what does that 10 11 mean? What's" -- do you know how like I 12 would be? My head would be cluttered. 13 I got too much stuff to do. I got 14 kids and a husband and work and bills. I 15 mean I got a life here. I can't analyze 16 every five seconds of a statement that Gregg 17 Roman makes. 18 Right. But I think it's fair to ask. Q. 19 I mean you said that he creeped you out 20 before. 21 He does. Α. 22 He creeped you out at AIPAC. Now Q. he's telling you you can't post on social 23 media. You find it weird. 24

		Page 207
1	A. I did find it weird.	
2	Q. Yet you're still getting on a plane	
3	with him by yourself to go to Israel.	
4	A. True.	
5	MR. CARSON: Objection. You	
6	can answer.	
7	THE WITNESS: Clearly, in	
8	hindsight, hindsight is 20/20,	
9	isn't that what they say poor	
10	judgment on my part.	
11	BY MR. CAVALIER:	
12	Q. And at the same time, you never told	
13	him, "You're being creepy. Stop"?	
14	MR. CARSON: Objection.	
15	THE WITNESS: He knew he was	
16	being creepy. Please stop	
17	insinuating like that man did not	
18	know. Please, you're insulting your	
19	own and my intelligence by	
20	insinuating that Gregg didn't	
21	understand what, how his behavior was	
22	making people feel. I mean he would	
23	have to be a total moron to not know	
24	how he was making people feel.	

```
Page 208
1
    BY MR. CAVALIER:
2
            That's not my question. My question
      0.
3
    is: Did you ever tell him, "You are making
4
    me uncomfortable?
5
            We went over this. How many times
6
    did we go over this? Do you want me to
7
    answer for the 5th millionth time? No.
8
                  MR. CARSON: Asked and
9
            answered.
                   THE WITNESS: Didn't I answer
10
11
            that like seven times? No. No.
12
    BY MR. CAVALIER:
13
         Did you tell him --
      Ο.
14
           No. No.
      Α.
15
            Did you tell him that it made you
      Q.
16
    uncomfortable that he was instructing you
17
    that you couldn't post anything on social
    media?
18
19
            Yes. I said, "That's weird". I did
    say that.
20
21
         You told him you thought that was
      Q.
22
    weird?
      A. Yes, I did, as a matter of fact.
23
    That I did.
24
```

```
Page 209
 1
             And what did he say?
       Q.
 2
             I don't remember.
       Α.
 3
             Did he say it was for security
       Ο.
 4
     reasons?
 5
             It's not for security reasons, and
       Α.
 6
     no, he did not say that.
             So you said, "This is weird" --
 7
       Ο.
 8
       Α.
             I think he was, didn't want his wife
     to know because she would object to it.
 9
     That's what I think. I think he probably has
10
11
     a history of cheating and his wife wouldn't
12
     like him in a room with a woman. That's
13
     what, that's what I think.
14
             Did you tell him that?
       Q.
15
       Α.
             No.
16
             You just said, "That's weird"?
       0.
17
                   That's how I talk.
       Α.
             Yes.
             You said, "That's weird", and he said
18
       Q.
     nothing and walked away?
19
20
             I don't remember what he said. Do
       Α.
21
     you not understand that this was two years
22
     ago? I don't remember everything like a -- I
23
     don't -- and I don't have super memory.
24
                   MR. CARSON: Obje- -- yes.
```

		Page 210
1	BY MR. CAVALIER:	
2	Q. Well, at the same time, I mean these	
3	seem like pretty significant events in your	
4	life, no?	
5	MR. CARSON: Objection.	
6	THE WITNESS: Yes, that's why I	
7	remember crystally clear like the	
8	actual events that happened, but like	
9	the minutia surrounding it is not	
10	like that. I mean that's classic.	
11	I remember if I have a really,	
12	if I have an argument with my	
13	husband, I can almost remember	
14	everything he says verbatim. Do I	
15	remember the conversation I had with	
16	him yesterday during the day, no, I	
17	don't remember any of that.	
18	Like it's minutia compared to	
19	the actual stressful key event.	
20	Can we take a break for a	
21	minute?	
22	MR. CAVALIER: Of course.	
23	MR. CARSON: Yes.	
24	MR. CAVALIER: How long you	

	Page 211
want?	
THE WITNESS: Five minutes, not	
even.	
MR. CAVALIER: Five minutes	
doesn't work. It never works. Let's	
make it ten so that we all get back	
at 2:43.	
THE WITNESS: Fine.	
MR. CARSON: Yes, I'm going to	
walk downstairs and grab a coffee.	
THE VIDEOGRAPHER: 2:33.	
(A recess occurred.)	
THE VIDEOGRAPHER: 2:47 p.m.,	
we're back on the record.	
BY MR. CAVALIER:	
Q. Okay. So, despite all of the prior	
history that you guys had, you still wanted	
to go on the Israel trip, yes?	
A. Yes.	
Q. So you get there. There's an issue	
with the bathroom. What happens then?	
MR. CARSON: Yes, I'm back.	
	THE WITNESS: Five minutes, not even. MR. CAVALIER: Five minutes doesn't work. It never works. Let's make it ten so that we all get back at 2:43. THE WITNESS: Fine. MR. CARSON: Yes, I'm going to walk downstairs and grab a coffee. THE VIDEOGRAPHER: 2:33. (A recess occurred.) THE VIDEOGRAPHER: 2:47 p.m., we're back on the record. BY MR. CAVALIER: Q. Okay. So, despite all of the prior history that you guys had, you still wanted to go on the Israel trip, yes? A. Yes. Q. So you get there. There's an issue with the bathroom. What happens then?

1				
			Page	212
1		Not in front of my camera yet, but		
2		I'll be there in a second. You can		
3		start though.		
4		THE WITNESS: What happened?		
5		We already went over this. I what		
6		are you specifically referring to?		
7	BY MR.	CAVALIER:		
8	Q.	Did you start working?		
9	Α.	Yes. I think we went first to, we		
10	had an	IDF meeting at the		
11		MR. CARSON: Wait. Can you		
12		guys		
13		THE WITNESS: Wait, what?		
14		MR. CAVALIER: I can hear you,		
15		Seth.		
16		MR. CARSON: All right. It		
17		sounded like you got started before I		
18		got back.		
19		THE WITNESS: Oh. Are you		
20		back? I thought you said		
21		MR. CAVALIER: We are starting.		
22		I thought you were back.		
23		MR. CARSON: Yes, no, I just		
24		got on, but go ahead. It's okay.		

		Page	213
1	BY MR. CAVALIER:		
2	Q. You had a meeting with the IDF?		
3	A. He did, yes. And I stayed and		
4	answered e-mails in like a, there was like		
5	this coffee place I ate at, and then he met		
6	me there. I'm trying to think of what		
7	like I don't know what you want to know here.		
8	Q. Okay. So was the first day of work a		
9	normal workday?		
10	A. Yes. I think it was until like the		
11	second we were there for a while. I think		
12	we were there for like seven days or		
13	something. I forget how long we were there.		
14	Q. Okay.		
15	A. It just felt like forever. I		
16	couldn't wait to get home.		
17	It was Gregg I didn't smoke at		
18	the time. Gregg usually chews nicotine gum.		
19	He was but he smoked there. And there was		
20	this outside balcony and it was kind of cold		
21	there or whatever, so he was out there		
22	smoking and he was like, "Come out here and		
23	talk to me". So I did. Like I sat. This is		
24	at nighttime. Well, I don't know which day		

```
Page 214
1
     it was, but it was one of the days. And he
2
     sat -- I sat like -- I don't know, like he
3
     was one side of this like long couch thing
4
     outside.
5
             Okay. I don't, I'm sorry, I don't
       Ο.
6
    mean to interrupt you. I'm going to ask you
7
     to pick right back up. But we're assuming
8
     this is like the second night you're in
     Israel?
9
       Α.
             Like maybe the second or third.
10
11
     was like --
12
             First, early in the trip?
      Q.
13
       Α.
             Earlier in the trip, right, yes.
14
             Okay. Up until that point, did
       Ο.
     anything happen about which you would
15
16
     complain?
17
             Physically, no.
       Α.
             In any way? Verbally?
18
       Q.
             I mean the two incidents that
19
       Α.
20
     happened there like cloud my memory. Do you
21
     know what I'm saying? Like it was just like
22
     I just -- I hardly remember any of the trip.
23
     I remember those things.
24
             That's fair.
       Q.
```

Page 215 1 Like I remember -- there's certain 2 things I remember. Like I remember being at 3 the Knesset. I remember eating lunch there. 4 I remember going to a different lunch with 5 the interior Sud guy. I remember going, like 6 going out by myself. I remember going to --7 like not, Gregg not letting me go see the old 8 city, whatever. Like there's certain -there's like -- I remember like chunks of it. 9 Like you know what I mean? I don't know how 10 11 to explain it. 12 But that, you know, I don't remember exactly what day it was, but I remember that 13 14 it happened. You know what I mean? I don't 15 even remember -- I remember we ate. 16 trying to, if I could try to think right, we 17 had dinner one night that we got there, and it was fine. Yes, I don't remember --18 19 Okay. Q. -- anything like that like sticks out 20 21 other than these like two crazy things. 22 Q. Okay. So tell me about the two crazy things. 23 So the one, like I said, he was out 24 Α.

		Page 216
1	smoking a cigarette and asked me to come	
2	outside. So I did.	
3	Q. Early in the trip?	
4	A. What?	
5	Q. Early in the trip still, right?	
6	A. Yes. This is the early in the trip	
7	one.	
8	Q. Okay.	
9	A. And he was like I sat like further	
LO	down. It was like a long couch, and he was	
L1	like on one side and I was on the other. So	
L2	he's like big though. Like Gregg is tall.	
L3	So he was like getting comfortable, he had	
L4	the blanket, he's smoking a cigarette and he	
L5	like, like moves his body like this, like,	
L6	you know, to the whatever side to me, puts	
L7	his feet there, and I was sitting like kind	
L8	of like, like with my legs up kind of	
L9	comfortable, you know. And he slides his	
20	like foot like under my butt and he was like,	
21	"Oh, I guess we reached a new spot in our	
22	relationship. My foot is on your ass". I	
23	was like, "Gregg". And then I moved, like I	
24	went and moved away or whatever, and then we	

Page 217 1 just continued our conversation. He's like, 2 you know, "You really need to be like my 3 right hand. It's going to be like me and 4 Like you're my, you know, you're my 5 second in command. We're going to make you all this. Like, you know, you're going to, 6 7 you're going to be leading this. We'll make 8 you like some type of Chief of Staffer. You 9 can eventually like run the project directors, you can run the calls, all that 10 11 stuff". 12 So that incident I was like "ugh, what is this dude doing", like I thought 13 like -- whatever. And like I said, it was 14 15 uncomfortable and I didn't like it, but here 16 I am in Israel. What am I going to do, like 17 find a flight home and go to a foreign, like navigate a foreign country where I don't 18 19 speak the language and whatever? Like there 20 were air raid sirens. I was like nervous 21 there in general. Like we weren't -- he said 22 the area we stayed in were nice, was nice, 23 but let me tell you, like it was like one building was nice and the next one had 24

Page 218 1 graffiti on the wall. Like you know what I 2 I didn't feel safe there at all. 3 Gregg made it feel like it wasn't safe, 4 "Because I got this because there's extra 5 security. You can see like the camera 6 outside, and like, you know, you need" -- he 7 always kind of like made me fearful in 8 general for my life. 9 Like the reason I said "hey, can I go to the old city", right, like when we went to 10 11 the Knesset and he was like, "Oh, there's not 12 going to be any time", blah, blah, blah. 13 "Well, I'll just go by myself, and I'll meet you back there". You know what I mean? Like 14 15 let me just go look. And he was like, "No". 16 He was like, "You're a pretty girl and like 17 something bad will happen to you, and like I'll be responsible for you like getting 18 19 attacked". Like he always made me feel like 20 if I left his side or wasn't in that room 21 that something like terrible was going to 22 happen to me. He just, he was like always 23 like inciting fear. And so when he put his foot under my 24

		Page 219
1	leg, under my butt and stuff, I'm like, "What	
2	am I going to do here? How am I going to get	
3	out of this situation? So I'm just going to	
4	avoid him". So that's what I did for the	
5	most part. I tried to avoid him as much as	
6	possible.	
7	Q. Let me back you up a second. You	
8	said that he always made you feel unsafe. I	
9	mean it wasn't the safest	
LO	A. While I was there. When I got to	
L1	Israel, he made me feel unsafe.	
L2	Q. But you also told me that it wasn't	
L3	that nice a neighborhood, right?	
L4	A. Yes. He made me feel	
L5	MR. CARSON: Objection.	
L6	THE WITNESS: He made me feel	
L7	unsafe like it wasn't that nice of	
8.	a neighborhood, and he made me feel	
L9	unsafe in that like he reinforced	
20	that like he said it was a nice	
21	neighborhood, but like you don't know	
22	who is out to get us and you don't	
23	know who is like whatever.	
24	Like he made me feel like if I	

		Page 2	220
1	wasn't like, I don't know, like		
2	attached at the hip to him that like		
3	I you know, there was a time where		
4	like I went out, finally after the		
5	it was the night after the real big		
6	incident with him, the blow jobs and		
7	all that that like he was like, "I'm		
8	having somebody over to the house for		
9	meetings. You can go like walk		
10	around". I was like, "All right.		
11	Well, I'm going to go to like that		
12	little market that was down there		
13	that looked cool or whatever", and		
14	that's what I did. And I went to the		
15	beach and like put my feet in the		
16	water. And I was like, you know,		
17	thinking and reflecting. And I tried		
18	to stay there as long as possible.		
19	And he's like, "Are you coming back?		
20	Are you coming back"?		
21	Like just he it was like		
22	such a bad experience. It was just		
23	like, you know, like he tried to		
24	make, Gregg always tried to make,		

		Page 221
1	like always made you, and this is not	
2	just Israel trip, always made you	
3	feel like you needed him, like you	
4	needed him, he's in control, he's the	
5	boss, he's everything, you need him.	
6	You know what I mean? And like	
7	and Israel it was heightened and it	
8	was and he made me nervous. And	
9	I'm not like a scared person. I mean	
LO	I've lived in rough neighborhoods in	
L1	Philly. Like that's not I'm not	
L2	that kind of person. Like I'm not	
L3	afraid, usually. And he just made me	
L4	like uncomfortable.	
L5	And so when he touched me like	
L6	with his foot, like I'm thinking	
L7	like, "What do I do here? Do I go to	
L8	the police? Do I freakin' leave? Do	
L9	I go get my own place? Like what do	
20	I do"? And I was like, "I'll just	
21	avoid him". I talked to my husband	
22	and he was like, "Just avoid him.	
23	Just avoid just like, you know,	
24	but it doesn't have to be work, just	

Page 222 1 go sit in your room". 2 And so I tried to be in my room 3 as much as possible. I even would 4 say like, I even would like make 5 stuff up like, "Oh, my husband is" --6 it was like weird hours. "Oh, my 7 husband is calling me. I'm going to 8 go in my room". You know what I mean? Like just I like had to avoid 9 him. 10 11 Now, I FaceTimed and like did 12 stuff in front of him, but like that 13 was also like a signal like I'm with 14 my family and doing -- you know, I 15 just, ugh, it was the whole thing was awful. 16 17 BY MR. CAVALIER: 18 Given the fact that the neighborhood wasn't that nice and there are air raid 19 20 sirens going off and you're meeting with 21 certain high-level groups, isn't it possible 22 that his concern for your safety was just 23 legitimate concern for your safety? 24 MR. CARSON: Objection.

		Page 223
1	THE WITNESS: I mean it's	
2	possible, but that's not, that's not	
3	how he made me feel.	
4	BY MR. CAVALIER:	
5	Q. Okay. But you don't have any reason	
6	other than your own feeling to believe that	
7	that wasn't his motivation, do you?	
8	A. No.	
9	MR. CARSON: Objection.	
10	BY MR. CAVALIER:	
11	Q. All right. So did you say anything	
12	to him when he put his foot underneath you?	
13	A. I said, "Gregg, stop".	
14	Q. Did he stop?	
15	A. Yes.	
16	Q. Okay. Did you tell anybody else that	
17	you encountered on the trip about what had	
18	happened?	
19	A. No. They were his people. I they	
20	barely even spoke English, half of them.	
21	Q. You told me that you told your	
22	husband what happened?	
23	A. But you said anybody that was on the	
24	trip I thought you said.	

```
Page 224
 1
             Yes, I did. I'm asking you --
       Q.
 2
             My husband wasn't on the trip.
       Α.
 3
             Right. But you did tell your husband
       Ο.
 4
     what happened?
 5
             I did. I told my husband; my mom;
       Α.
 6
     Katherine Urkel, who is the lady that like,
 7
     well, my work wife. I told a bunch of
 8
     people.
             Did you ask any of them to try to
 9
       Ο.
     arrange for you to get home?
10
11
       Α.
                  I mean my husband just said,
12
     "Just avoid him", so that's what I did.
13
       Ο.
             Okay. And so --
14
             And my mom goes, "I told you that was
       Α.
15
     going to happen".
16
       Ο.
             Right.
17
            "Yes, mom, I'm an idiot".
       Α.
18
             Right. But you thought avoiding him
       Q.
19
     was --
20
             Sufficient.
       Α.
21
             -- a practical, a sufficient
22
     resolution to the issue?
23
             At the time, yes. In hindsight, I
       Α.
24
     was naive.
```

		Page 225
1	Q. Okay. So you're avoiding him, and	
2	otherwise, work goes on as normal on the	
3	trip?	
4	A. Yes, until he went out that night.	
5	Q. What night?	
6	A. The night before we left.	
7	Q. Okay. So we're now a couple days	
8	after the foot incident	
9	A. Uh-huh.	
LO	Q on the eve of you going back, of	
L1	everybody going back home, both of you going	
L2	back home?	
L3	A. He had a meeting the next day, and	
L 4	then I think we were flying out it was	
L5	like the night or two before we left.	
L6	Because the next day he had those meetings	
L7	that I wasn't a part of and then I walked	
L8	around, and I think that was my last day	
L9	there. And I don't remember if we flew out	
20	in the night or first thing in the morning.	
21	I can't remember when we flew out.	
22	Q. Okay. In between the foot incident	
23	and the second incident, did anything of a	
24	sexually offensive nature occur?	

Page 226 1 Α. No. 2 Tell me about the second incident. Ο. 3 So Gregg goes out and he says he's Α. 4 got a meeting, and I'm wondering why I can't 5 go because I had been going to most of them. 6 And he goes out to a meeting and he comes 7 back and he's clearly drunk, and I was 8 working on this PowerPoint presentation. He's clearly drunk, and I'm sitting on the 9 couch. And there's two couches. I was on 10 11 the left-hand side one. 12 And he's like stomping around and talking to me about how he -- he comes in and 13 14 he was like, "Ugh". He's like, "Did you know 15 that I had sex with Lea Merville"? And I was 16 like, "Excuse me. What? Lea"? And I -- and 17 I heard whispers of that from like Matt, but I didn't really believe him because I didn't 18 think Lea Merville would ever sleep with 19 20 Gregg Roman. And so he said -- but I didn't 21 hear any details from Matt. Like I just 22 heard that it happened. 23 And so then I was like, I don't know, like, "Whatever. Like I don't want to hear 24

```
Page 227
1
     about you sleeping with Lea Merville". He
2
     was like, "Well", --
3
             Did you say that to him?
      Ο.
4
      Α.
             What?
5
             Did you say that to him?
      Ο.
6
             No. I was just like, "I didn't know
      Α.
7
     that".
8
             Okay.
      Q.
             No. Like I said, I was trying to
9
       Α.
     like avoid him. Like I didn't want to get
10
11
     into a conversation with him, so I'm not
12
     going to like talk to him. Do you know what
              That wasn't my intention to like
13
14
     engage more in conversation. I was like,
15
     "No, I didn't know that".
16
             But, anyway, he told me that Lea, he
17
     was like, "Did you know she was a dancer?
18
     She's got a rocking body. I fucked her".
19
     And I was like -- and then I said, I asked
20
     him, "When", right, because like I -- she was
21
     our intern there. And he was like, "When we
22
    were in Israel, we met up at an event and she
23
    needed her paperwork signed like to certify
    her internship at MEF". She was no longer an
24
```

		Page	228
1	intern but she needed this paper for her		
2	class credit or whatever. And he told me		
3	that, he said that the paperwork was up in		
4	his room and she went up there and one thing		
5	led to another and she gave him a blow job,		
6	she was on top, I got the whole thing, about		
7	her dancer body, and just gross and		
8	inappropriate, you know.		
9	And he was like and then he		
10	started like trying to justify like why he		
11	was cheating on his wife and that it's hard		
12	having three kids and being a director and		
13	that it's a lot of pressure and all that kind		
14	of stuff. And that's when he was like, you		
15	know, "Sometimes I just need a release.		
16	Sometimes I just need a release. Like why		
17	can't I just have a good blow job. I tried		
18	to meet up with Lea and she said no". And I		
19	was like (witness made a sound).		
20	So, anyway, he was drunk and he was		
21	running around, and I wasn't engaging in that		
22	at all, right.		
23	Q. Did you say		
24	A. That was the extent of my engagement		

Page 229 1 in him. So I guess --2 You said nothing to him in response Ο. 3 to what he was saying? 4 Α. I mean I was just like, "I didn't 5 know that. I can't believe that you slept 6 with Lea. She's young". You know what I 7 mean? 8 Okay. Q. It was just weird to me. So he 9 leaves I guess because I'm not engaging in 10 11 the conversation or whatever. He's like, 12 "I've got another event. I'm going out", 13 blah, blah, blah, blah. 14 Then he comes back the second time 15 and says that he tried to meet up with his 16 ex-girlfriend and she denied him too. And he 17 was like, "I don't know what it takes to just get laid around here. Like I want a blow 18 19 job. I just need a release". "Lis", -- what 20 was he, what did he say? He said, "Lis", he 21 was like, "can't you just give me a release"? 22 And I was like, "Gregg, no. Stop it. You're 23 being creepy", right. And then I was texting my husband, I 24

Page 230 1 was like, "Gregg is being creepy. FaceTime 2 me, whatever", and he -- my husband was like 3 laughing like thinking it was funny. Like I 4 don't think that he understood at the time 5 the severity of like how uncomfortable I was. 6 So then I started texting Tricia, and 7 I like went in my room and I started texting 8 Tricia and I was like, "Dude, Gregg is being disgusting". And she was like, "What, like 9 AIPAC couch". And I was like, "No". Because 10 11 he was worse than that. Like he was, you 12 know, like asking me and talking about sexual 13 conquests. He used the word "conquests", and 14 I remember that. I remember him just being 15 so crazy. 16 So I got a knife. I said to her, 17 "I'm going to get a knife and put it under my bed". Because, A, my door didn't lock it. 18 19 So the way my room was set up it was a big, glass like wall maybe that had curtains, and 20 21 my door barely even shut all the way. It like didn't lock. And so I was like, "I'm 22 23 going to put a knife under my bed and sleep with it". Because he's big. Like I think 24

		Page 231
1	I'm strong and I'm tough, but I can't fight	
2	6'5", 300-pound Gregg, like I can't do it.	
3	So I slept with a knife under my bed, and I	
4	said that to her. And I came home and I told	
5	her, I told my mom, I detailed it in text to	
6	Katherine Urkel. Like I told people. It was	
7	awful. It was awful.	
8	And then when he said I didn't have	
9	to go to the meeting the next day, I was so	
10	relieved, I just wanted to get out of there.	
11	I was gone as long as possible. I stayed	
12	away as long as possible, and I just could	
13	not wait to get home.	
14	Q. Did you tell Gregg that he made you	
15	so uncomfortable that you slept with a knife	
16	in your bed?	
17	A. No. Why would I tell him that? I'm	
18	afraid of him.	
19	Q. I mean	
20	A. Especially at that point, he was	
21	drunk, out of control. He was saying crazy	
22	things.	
23	Q. The next day	
24	A. I didn't know how he was going to be	

		Page 232
1	that day	
2	Q. The next day on the plane ride home?	
3	A. So I can just go missing there and	
4	nobody would know, right, like because I'm in	
5	this scary land and in this scary	
6	Q. Okay.	
7	A neighborhood and it's a scary	
8	time, and I'm a pretty, tall, white girl	
9	according to him.	
10	Q. At the airport	
11	A. What?	
12	Q. At the airport or on the flight home	
13	or when you got back to Philadelphia, did you	
14	ever tell him like, "Hey, you made me so	
15	uncomfortable in Israel I slept with a knife	
16	in my bed"?	
17	A. Do you think I wanted	
18	MR. CARSON: Objection.	
19	THE WITNESS: to lose my	
20	job?	
21	BY MR. CAVALIER:	
22	Q. It's your belief that you would have	
23	been fired for telling your boss he was	
24	making you uncomfortable?	

Page 233 1 Yes, a hundred thousand million Α. 2 percent. 3 Did you ever tell Gregg that you had Ο. 4 something that was concerning you but you 5 were afraid that if you told him he would 6 fire you? 7 Α. No. But he noticed he -- he noticed 8 the change in me because he brought it up to Marnie. 9 10 Ο. What do you mean by that? 11 Α. Like I was not the same old like 12 nice-to-him Lisa and like I was different. 13 And Marnie said -- and then Marnie said --14 and then he started like right away, it was 15 like, "Lisa is not going to sleep with me. 16 There's no use for me, for Lisa anymore 17 really". Like it was like a day after we got back or something, and then he started 18 19 criticizing something I did. I don't 20 remember what it was. 21 And I sat down and talked to Marnie 22 about it, and she was telling me like what 23 his issue was, which was weird because Gregg normally would come to you. He wouldn't go 24

```
Page 234
     to like a third party. So -- and I was like,
1
2
     "Really? After the way he acted in Israel,
3
     that's how -- that's -- like he's going to
4
     complain about this the way he treated me".
5
     And she goes, "What are you talking about"?
6
     And I was like, "Nothing, never mind".
7
     Because I -- and she tried to pull it out of
8
          She was like, "What happened in Israel"?
     And I was like, "I'm not getting into this".
9
             And I told Matt, and I told Tricia.
10
11
     And Matt was like, "Well, we should do
12
     something. We should go to Daniel. We
     should do something". And I was like, "I
13
     don't want to get involved. Like I don't
14
15
    want to lose my job. I'm like not interested
16
     in this. It would be bad for my reputation
17
     as like a conservative pers-, like Me Too
     person". And we had lengthy, lengthy
18
19
     conversations. I would sit in Matt's, on
     Matt's floor in his office and complain to
20
21
     him and tell him everything.
22
      Q.
             Okay.
23
             Matt knew everything.
       Α.
24
      Q.
             So --
```

			Page	235
1	A.	Tricia knew everything, and right		
2	away.			
3	Q.	Did you say you talked to Marnie?		
4	Α.	I started to talk to Marnie. I said,		
5	"With t	he way he acted in Israel and this is		
6	how he'	s going to be, the way he treated me".		
7	And she	's like, "What happened in Israel"?		
8	Q.	She tried to get it out of you?		
9	Α.	And then she told me later that Gregg		
LO	told he	r that I came onto him in his room.		
L1	Like on	what freakin' planet.		
L2	Q.	So I just want to, I want to clarify		
L3	somethi	ng. You told me that Marnie tried to		
L4	pull th	e story of what happened in Israel out		
L5	of you?			
L6	A.	She did.		
L7	Q.	That's what you said?		
L8	A.	Uh-huh.		
L9	Q.	But you just terminated that		
20	convers	ation?		
21	A.	Well, I start I was about to open		
22	up to h	er, but something in me was like		
23	don't.	Because she's in like Gregg's pocket.		
24	Q.	So you didn't tell her the story?		

Page 236 1 Uh-uh. I didn't tell her. I just 2 told Matt and Tricia. I trusted them. At 3 the time, I wasn't, I wasn't like on good 4 terms with Marnie like. 5 What was Matt's, what was Matt's 6 position at the time? 7 Α. The Director of Development. 8 And he said that you should go talk Ο. to Daniel Pipes with him? 9 He suggested it, and he said we 10 Α. 11 should go to Daniel Pipes with him. And then 12 Tricia is like, "You should definitely do 13 something about it because what if it's another girl". And he's like, "I've got 14 15 Caitriona starting soon. Like what if this 16 happens to her", blah, blah, blah, blah, 17 blah. And I was like, "I know", and -- but 18 19 I was really hesitant because I kept thinking 20 about my job and my money and my kids and, 21 you know, all of that. Like I didn't want 22 to, I didn't want to lose a job, and I didn't 23 want to ruin my reputation. So, in the end, you told Matt and 24 Q.

```
Page 237
1
     Tricia, what, "thanks for the advice but no
2
     thanks"?
3
                   MR. CARSON: Objection.
4
                   THE WITNESS: Well, no. I
5
            think we collectively, collectively
6
            decided that like, "Okay, well,
7
            nobody is going anywhere with Gregg
8
            after that again anymore, and like
            just to watch out. And just come
9
            into work, do your job, and then go
10
11
            home".
12
     BY MR. CAVALIER:
13
             Okay. Okay. Did you ever have text
    message conversations with Gregg in which you
14
15
     referred to him as, quote, baby?
16
             I don't think so.
       Α.
17
             Do you ever remember having text
     message conversations with Gregg Roman where
18
     you said to him that, "You should feel
19
20
     comfortable telling me when you're upset"?
21
             He should feel comfortable --
       Α.
                   MR. CARSON: Objection.
22
23
                   THE WITNESS: -- telling me
24
            when he was upset, yes.
```

		Page 238
1	BY MR. CAVALIER:	
2	Q. Why?	
3	A. I probably said that.	
4	MR. CARSON: Objection.	
5	THE WITNESS: It's definitely	
6	something I would say. It's	
7	something I say to everybody.	
8	MR. CARSON: Lisa, let me get	
9	the objections in.	
0_	THE WITNESS: Sorry.	
.1	MR. CARSON: I'm going to	
2	object to the mischaracterization of	
.3	the text message. I think you should	
4	show her the text message, work text	
.5	message.	
-6	BY MR. CAVALIER:	
_7	Q. You said that you he should feel	
-8	comfortable telling you when he's upset. Why	
9	do you, what do you mean by that?	
20	MR. CARSON: Objection. If	
21	you're going to show her a text	
22	message, I think you should show it	
23	to her.	
24	MR. CAVALIER: I'm not	

		Page 239
1	referring to the text message	
2	anymore.	
3	MR. CARSON: Okay.	
4	MR. CAVALIER: I'm referring to	
5	the witness' testimony.	
6	MR. CARSON: I'm going to	
7	object based on the fact that you're	
8	talking about a text message that you	
9	haven't presented to the witness that	
10	was sent a long time ago. But if she	
11	remembers, she can	
12	THE WITNESS: I do want to know	
13	about the "baby" thing.	
14	BY MR. CAVALIER:	
15	Q. We'll get there.	
16	A. Well, can we get there now since we	
17	were there first? Because that's the first	
18	question you asked me. So I'd like to go to	
19	that first.	
20	Q. Well, I can appreciate that,	
21	MR. CARSON: Lisa,	
22	BY MR. CAVALIER:	
23	Q but I have a question pending.	
24	MR. CARSON: He's going to do	

```
Page 240
1
            the dep in the order he wants to do
2
            it in, but like -- yes, my objection
3
            is on the record.
4
     BY MR. CAVALIER:
5
             You said when I asked you that
6
     question that, "He should feel comfortable
7
     telling me when he's upset". Do you
8
     remember --
9
             Yes. Everybody should feel
       Α.
     comfortable telling me when they're upset.
10
11
     Because I'm an honest, good person, and
12
     people should be able to tell me when they're
13
     upset or unhappy with my work performance or
14
     anything like that. Like I'm not going to
15
     freak out.
16
             But, see, Gregg saw me as a
17
     liability, so of course he wasn't going to
18
     tell me when he was upset. He's going to
19
     tell other people. Because now I'm a
20
     liability just like Eman was to him, --
21
             Why do you say that?
22
       Α.
             -- a liability. So, of course, I
23
     would say "yes, I want you to tell me if
     you're upset with me or my work performance",
24
```

		Page 241
1	of course.	
2	Q. Why do you view yourself as a	
3	liability?	
4	A. What?	
5	Q. Why do you say	
6	A. Because he knows what he did to me.	
7	MR. CARSON: Yes, objection.	
8	She said Gregg viewed her as a	
9	liability. She didn't say she viewed	
10	herself that way.	
11	MR. CAVALIER: That's fair	
12	enough, Seth.	
13	BY MR. CAVALIER:	
14	Q. So why do you, why do you feel that	
15	Gregg viewed you as a liability? Did he ever	
16	say that to you?	
17	A. It was the way he treated me.	
18	Q. Did he take your responsibilities	
19	away?	
20	A. He kind of did. I mean over time	
21	after Israel, like he starts downplaying	
22	stuff and giving me stuff that he thought was	
23	rough. That's the reason why I got the Tommy	
24	Robinson thing.	

		Page 242
1	The Tommy Robinson project was not,	
2	was absolutely not like an extra	
3	responsibility. It was something that Gregg	
4	was pawning off on me because he didn't want	
5	to do it. He thought it was ridiculous.	
6	Q. Did he ever tell you you were a	
7	liability?	
8	A. No. He told me Eman was, so I know	
9	how he thinks.	
10	Q. But you're Caucasian?	
11	A. He said she was a woman, she was a	
12	lesbian, and she was a Muslim. That's what	
13	he said.	
14	Q. But you're not a Muslim?	
15	A. He gave me those three things.	
16	Q. But you're not a Muslim?	
17	A. I'm a woman. I qualify for one of	
18	those.	
19	MR. CARSON: Just wait for a	
20	question.	
21	THE WITNESS: Sexually	
22	harassed.	
23	MR. CARSON: Just wait for a	
24	question.	

			Page 243
1		THE WITNESS: And he admitted	
2		to it.	
3		Let's all not forget Gregg,	
4		wait, let's not forget that Gregg	
5		admitted to all of this, and he said	
6		he did it because he was a social	
7		junkie. That was his excuse. He	
8		admitted it. It's in e-mail. He	
9		admitted all of it.	
10	BY MR.	CAVALIER:	
11	Q.	Just to be clear, you don't share the	
12	same cl	naracteristics that Eman does, right?	
13	Α.	I'm a woman.	
14	Q.	But you're not a Muslim?	
15	Α.	So what.	
16	Q.	You're not a lesbian?	
17		MR. CARSON: Just answer the	
18		question.	
19	BY MR.	CAVALIER:	
20	Q.	Correct?	
21	Α.	Yes, correct, correct.	
22	Q.	Is Gregg Roman a direct person?	
23	А.	No.	
24	Q.	He had power over you?	

			Page 244
1	Α.	Yes.	
2	Q.	While you were in Israel, did he ever	
3	outrigl	nt ask you for a blow job?	
4	Α.	I just told you "yes". He said	
5	Q.	You told me	
6	Α.	No, not a blow job. A release.	
7	Q.	A release. So	
8	А.	A release.	
9	Q.	the answer to my question about	
10	the blo	ow jobs is "no"?	
11		MR. CARSON: Objection. That's	
12		a mischaracterization of her	
13		testimony. Go ahead.	
14	BY MR.	CAVALIER:	
15	Q.	Did he ever specifically ask you for	
16	a blow	job in Israel?	
17	Α.	Let's characterize what he did say.	
18	Q.	Sure.	
19	Α.	He said, "I just want a blow job. I	
20	need a	release. Lisa, can you give me a	
21	release	e"?	
22	Q.	Okay, fair enough. Did he say	
23	anythi	ng else that was sexual in nature	
24	during	the Israel trip besides that?	

		Page 245
1	MR. CARSON: Objection. Other	
2	than everything she already testified	
3	to?	
4	THE WITNESS: He also put his	
5	foot on my ass and	
6	MR. CARSON: Are you talking	
7	about in addition to everything else	
8	she already testified to, anything	
9	else beyond that?	
10	MR. CAVALIER: All right. I'll	
11	clarify the question.	
12	BY MR. CAVALIER:	
13	Q. Besides his remark when he put his	
14	foot under you and besides the comment about	
15	needing a release, can you give him a	
16	release, did he	
17	A. And besides him explicitly detailing	
18	his sexual encounter with Lea Merville,	
19	besides him explicitly talking about his	
20	sexual relationship with his wife, besides	
21	him explicitly talking about his sexual	
22	relationship with his ex-girlfriend, besides	
23	him talking about all his other	
24	ex-girlfriends and sex for a long time?	

Page 246 1 Maybe. Not that I recall right this 2 second. Maybe he did. Maybe he didn't. 3 They're the ones that stick out in my mind. 4 Ο. Did he ever specifically, other than 5 the comment about needing a release, ask you 6 for anything that you would have interpreted 7 as a sexual favor during the Israel trip? 8 Α. No. You mentioned Tommy Robinson. 9 Ο. said, "That's why I got the Tommy Robinson 10 11 thing". What did you mean about that? 12 Α. Why I got the Tommy Robinson project. 13 Ο. Right. It was like a nothing to him. He 14 Α. 15 hate -- he thought the whole thing was 16 ridiculous and stupid. 17 So like you were, like you asked me if he gave me increased responsibility. No. 18 19 As a matter of fact, --20 But you didn't --Ο. 21 -- he made me start making more 22 meetings and doing dumb stuff that I hated and he would criticize things, and they would 23 make things up that I did wrong or didn't do 24

```
Page 247
1
     wrong or whatever. It was non-stop.
2
             Let me tell you, Gregg Roman is a
3
     machine of a terrible person. I kept
4
     thinking in my head that there was some
5
     redemption in this man. There isn't. He is
6
     a terrorist to women.
7
             Was the Tommy Robinson project a
       Ο.
8
     nothing project?
             According to -- well, he thought it
9
     was in the beginning until it got blown up,
10
11
     and then he made comments about like, "I
12
     haven't even met this guy, and you're on CNN
13
     and I'm not. This is -- I can't believe how
14
     big this has gotten. This is ridiculous".
15
             Did that upset you?
       0.
16
             He thought it was a nothing until it
17
     got to be something.
18
             Did it upset you that he treated it
       Q.
19
     that way?
20
      Α.
             Huh?
21
             Did it upset you that he treated it
       Q.
22
     that way?
             I mean partially yes, partially no.
23
       Α.
     Like do I think that I should, you know, be
24
```

Page 248 1 recognized for doing a good job or whatever, 2 Do I understand that like Gregg demeans anything that I did after that point, 3 4 absolutely. 5 Like before Israel, he would like 6 talk me up and be so proud, and blah, blah, 7 blah, blah, blah. After Israel, everything 8 changed. He would still be sexually gross, and then he started treating me like shit. 9 So it was like the weirdest thing ever. 10 11 Okay. Well, so then let's talk about Ο. 12 the period of time between Israel and 13 November, early November 2018. Was Gregg 14 still making sexual comments to you during 15 that period of time? 16 Not comments, but still overtures. 17 Still talking about women and making me watch 18 his deejay videos and like breathing down my 19 neck, making me sit close to him. 20 There was other times where he was 21 like, you know, after Israel, like he would 22 try the whole, you know, "Lisa, it's just me 23 and you" thing, like "we're a team", you're my partner", "you're my number 1 here", like 24

		Page 249
1	that kind of thing but like in that like	
2	whatever way. You know what I mean? Like he	
3	would be like or if I wore flats, he'd be	
4	like, "You're not wearing your high heels	
5	today", like.	
6	Q. I'm having trouble reconciling this	
7	again. Because on the one hand you're saying	
8	he's treating you like shit, and then on the	
9	other hand you're saying he's saying "you're	
10	my number 1 partner, I need you" and all	
11	this.	
12	A. Correct. Correct.	
13	Q. So it sounds to me like whether he	
14	praises you or criticizes you you're upset	
15	about it?	
16	A. No. Oh, no, no. This is because	
17	MR. CARSON: Wait. Wait.	
18	BY MR. CAVALIER:	
19	Q. Is that the case?	
20	MR. CARSON: Let me get an	
21	objection in. I'm going to object to	
22	the mischaracterization of the prior	
23	testimony. Object to form.	
24	Argumentative. You can answer.	

Page 250 1 THE WITNESS: Okay. This is 2 the deal, Gregg would do these little 3 things to manipulate. Like he would 4 say "you didn't get this whatever 5 out" or "I don't like the way the 6 project director minutes went out 7 today", like, "I don't like the 8 format they were in", which is the format they were always in, or 9 whatever, something like that, right, 10 11 and he would start nitpicking at like 12 weird things. So then they did -- this is 13 14 like the strongest example of it in 15 my mind, which happened after like we 16 went to Daniel Pipes, but here's an 17 example of this kind of stuff that 18 they would always do. So there was a 19 call where we were on the phone, 20 project directors' call, and this is 21 when I was like supposed to be 22 putting articles out. And so I was 23 supposed to be putting articles like on, like out like sending them to our 24

		Page 251
1	subscriber list. And on the call, it	
2	was like, "Hey, we're not sending	
3	like the IW newsletters out anymore".	
4	And I was like, "Well, nobody did	
5	that before me", right.	
6	So then he goes now, Daniel	
7	Pipes wasn't on the directors' call.	
8	So then he goes and must have said	
9	something to Daniel Pipes. So Daniel	
LO	Pipes says, "Lisa, it's come to my	
L1	attention that you haven't been	
L2	sending out the IW articles", and I	
L3	was like, "Well, nobody ever told me	
L4	that I had to. The project director	
L5	didn't tell me to. It's not	
L6	something that anybody before me did.	
L7	Because I sat in on the training for	
L8	the first, for the two people that	
L9	did it before me". And so he's like,	
20	"This is unacceptable", whatever	
21	happened.	
22	So then I went to the guy who	
23	did the job before me in May, and I	
24	said, "Hey, did you send out these	

		Page 252
1	articles"? And he goes, "No. Here's	
2	an e-mail list, a chain that we	
3	weren't going to do that anymore".	
4	Both CC'd on there was Daniel Pipes	
5	and Gregg Roman. I brought that to	
6	their attention. All of a sudden,	
7	that went away.	
8	So what he would do is he would	
9	smile and be like he's nice but then	
LO	he would do those terrible,	
1	manipulative things; that he knew he	
L2	sent the directive out not to put the	
L3	IW articles out and then accused me	
L4	of not doing my job. That's the kind	
L5	of things he would do. He was awful.	
L6	And then he would call me. He	
L7	would call me at 11:00 at night, "I'm	
L8	driving home. I need to rant. You	
L9	need to take down my thoughts". Like	
20	no, not at 11:00 at night. He would	
21	call me at home and I would have to	
22	send him videos, "Gregg, this is what	
23	I'm dealing with. This is my kids.	
24	I can't handle, I can't talk to you	

		Page 253
1	right now. It's past work hours".	
2	He would do those things. He would	
3	do those abusive like lying,	
4	manipulating things, and then he'd	
5	smile in your face and still tell you	
6	"where is your high heels". Like he	
7	is that person. So please do not	
8	mischaracterize me whether it's	
9	praising me or not praising me.	
LO	He did tell me, yes, he would	
1	try to like butter me up like "oh,	
L2	yeah, you're my number 1, you'll be	
L3	in charge of this, you'll be this".	
L4	All those things never came to	
L5	fruition of course, clearly not. But	
L6	then he would undermine my work, and	
L7	it wasn't because I wasn't doing a	
L8	good job. It was because of Gregg	
L9	and how he runs his show and how he	
20	lies and manipulates. And it was	
21	almost like I was, like as soon as I	
22	wouldn't sleep with him, I was	
23	expendable. But if he felt like, if	
24	he felt like "mmm, maybe I might try	

		Page 254
1	again and see how it happens" and	
2	that didn't work out, then I was	
3	expendable again. If I didn't kiss	
4	Gregg's ass, he would treat me like	
5	shit.	
6	BY MR. CAVALIER:	
7	Q. Okay. All right, fair enough. Let	
8	me, let me ask you about that then. If do	
9	you feel like when you were kissing his ass	
LO	he treated you well?	
1	A. Yes. I mean like here's an example.	
L2	If he would call me and I would actually	
L3	answer the phone at 11:00 at night, the next	
L4	day I would have a decent workday, right.	
L5	And if I didn't like, if he didn't say	
L6	something like, you know, like "oh, come look	
L7	at my video on the thing and like stand next	
L8	to me", if I didn't do those things, the next	
L9	day he was, he would nitpick my work. They	
20	were directly correlated. He would nitpick	
21	my work or he would do something.	
22	So absolutely, if I didn't like be at	
23	his beck and call or I was even like showing	
24	the least like bit of displeasure in him, the	

Page 255 1 next day he was an animal. It would be "you 2 went to the bathroom today six times" or it 3 would be "your" -- "you went to the bathroom 4 six times" or "oh, your door was closed, your 5 office door was closed for an hour today, who 6 are you on the phone with, what are you 7 talking about, what are you doing". Like it 8 was an interrogation all the time. It was unbearable. It was awful. 9 Did you think about quitting? 10 Ο. 11 I did. I did. I actually put a Α. 12 couple resumes out. I did, and I wasn't getting much back and so I stayed. I did 13 14 think about quitting. At that point after 15 Israel, especially like it got worse as time 16 went on, I did think about quitting. I 17 thought about quitting more than once. 18 So let me understand what you mean by Ο. that "it got worse". Did it get worse in a 19 20 sexual sense or did it get worse in a he's 21 being an asshole sense? 22 Α. Both. 23 Okay. So tell me how --Q. Because the sexual stuff continued, 24 Α.

		Page	256
1	okay, right. And it wasn't like, it wasn't		
2	like the direct assault kind of things,		
3	right, but it was like the innuendo, the		
4	breathing down your neck, like the high heel		
5	stuff, like my clothes.		
6	Like the sexual stuff was still		
7	there, but on top of the sexual stuff, then I		
8	got the on top of that, it started like		
9	the hostility and like the negativity. It		
10	was like both. It was compounded, and it was		
11	brutal.		
12	Q. Did you ever have a conversation with		
13	Gregg during that time about how you were		
14	feeling?		
15	A. I had said to him a number of times		
16	like one time he picked up the phone and		
17	he screamed at me. He was screaming at me.		
18	He called me at home to apologize because he		
19	was screaming so loud that I walked out. I		
20	walked out of the office. I hung up on him		
21	and I said, "You don't speak to anybody like		
22	that", and I walked out of the office.		
23	He was brutal to me. You don't know.		
24	You didn't live it. You think it's a joke		

		Page 257
1	because you're this fucking lawyer.	
2	MR. CARSON: If you need a	
3	minute, Lisa?	
4	THE WITNESS: No. This sucks,	
5	man. Because Gregg Roman gets to	
6	treat everybody like this and he gets	
7	away with it.	
8	MR. CARSON: Jon, why don't we	
9	just take just two minutes so she	
10	can	
11	MR. CAVALIER: You want to take	
12	five?	
13	MR. CARSON: Yes, just five	
14	minutes. Okay, thank you.	
15	THE VIDEOGRAPHER: 3:24 p.m.,	
16	we're off the record.	
17		
18	(A recess occurred.)	
19		
20	THE VIDEOGRAPHER: The time is	
21	3:33 p.m. Back on the record.	
22	BY MR. CAVALIER:	
23	Q. Who is Tommy Robinson?	
24	A. Political activist, citizen	

Page 258 1 journalist out of the U.K. 2 How did you become aware of Ο. 3 Mr. Robinson? 4 Α. Not aware of Mr. Robinson until Gregg 5 called me in his office and said "we have a 6 donor who wants to donate money to this 7 person" and that he wanted to find a way to 8 help him, and we were thinking about ideas. That was the first time I ever heard of him, 9 which is funny because apparently my dad had 10 11 heard of him before. And I told my dad what 12 I was doing at work, and he goes, "I know 13 that guy. I watched his videos". So I 14 didn't know who he was until then. 15 So Gregg brought it to your Ο. 16 attention? 17 Α. Correct. What did he instruct you to do? 18 Q. 19 He said that we would find ways, like Α. they do demonstrations in the U.K. and like, 20 21 you know, we could bus people to the court proceedings and whatever, but like let's look 22 23 at ways to do this. So I went looking on Facebook and I 24

		Page 259
1	found a guy who was throwing a rally in the	
2	Forgan (ph) in support of Tommy Robinson and	
3	he already had 5,000 people interested in	
4	going to the march, and I thought that that	
5	was a considerable amount and I brought it to	
6	Gregg's attention. I said, "I found this guy	
7	and this is what he is". And he's like,	
8	"Well, get in contact with him", and that's	
9	what I did. So I think I Facebook	
LO	Messengered the guy and, Danny Tommo, and we	
L1	went from there.	
L2	Q. So I have two follow-up questions	
L3	just to clarify points. "Danny Tommo" is	
L 4	Danny Thomas?	
L5	A. Yes. I'm sorry. He was on Facebook	
L6	as "Danny Tommo".	
L7	Q. You don't have to apologize. I know	
L8	who you're referring to and you'll know who	
L9	I'm referring to if we say "Danny Tommo", so	
20	that's fine.	
21	And I just want to be clear. Did	
22	Gregg task you with finding out ways to go	
23	about supporting Tommy Robinson?	
24	A. Yes.	

Page 260 1 Okay. So was that a normal part of Q. 2 your job to support things like this or to 3 find ways for the Forum to support things 4 like this? 5 Yes. I mean like, you know, I would 6 have to -- you know, he would ask me to like 7 come up with ideas all the time on different 8 things, like, you know, new places to go, donors to meet, whatever. 9 Okay. He valued your input on those 10 Ο. 11 kinds of things? 12 It was my job. I don't know if he 13 valued it or not. I can't make assumptions 14 on Gregg's value judgments, but he expected 15 me to do my job and that was to do the things 16 that he asked me to do. 17 He asked you for your ideas regularly? 18 19 Yes. I mean yes, I guess. For the Α. 20 most part, yes. 21 Q. Okay. 22 Α. That was what my job was. Okay. So did Tommy Robinson, did 23 Q. Tommy Robinson's platform align with the 24

		Page 261
1	mission of the Forum?	
2	A. Yes. I mean absolutely. They had	
3	supported Tommy Robinson in the past	
4	apparently. They paid for some of his legal	
5	defense in the past. It definitely aligned	
6	with the mission, yes.	
7	Q. Okay. So you reached out to Danny	
8	Tommo?	
9	A. Uh-huh.	
LO	THE COURT REPORTER: Yes?	
L1	BY MR. CAVALIER:	
L2	Q. And then what happened?	
L3	A. Yes. I'm sorry. Yes.	
L 4	Q. So what did you tell Danny Tommo when	
L5	you reached out to him?	
L6	A. I said, "We have a donor" well, I	
L7	said, "I see that you're having a rally.	
L8	We I'm from this organization from the	
L9	United States. They supported Tommy in the	
20	past and they want to support him now, and we	
21	have a sizable amount of money", which I	
22	think at the time was 20 or \$30,000 and,	
23	yes, 30, 20 or 30, something like that and	
24	that a donor specifically wanted to designate	

		Page	262
1	to Tommy Robinson and that we could help make		
2	this demonstration bigger, get speakers and		
3	bus people in.		
4	And we were looking at all different		
5	ways to make that happen. We were trying to		
6	bus people in, but that was difficult because		
7	bus companies didn't want to participate and		
8	it was hard to like get the logistical		
9	things. And so Gregg made the decision, so		
10	like I presented him the options and, you		
11	know, like all the things, and Gregg like		
12	made the decision on how we were going to		
13	move forward.		
14	Q. So you said the bus companies didn't		
15	want to participate. Is Tommy Robinson's		
16	message or persona controversial in England?		
17	A. Yes. He's definitely		
18	mischaracterized in the media, but yes, he's		
19	definitely a controversial figure.		
20	Q. In what respect?		
21	A. So he speaks out about		
22	Muslim-grooming rape gangs. That's his like,		
23	his thing that he started. He is		
24	anti-Islamic extremism and they have a heavy		

Page 263 1 Muslim population in the United Kingdom, so 2 he's pretty unpopular. 3 Okay. And was he in prison at this Ο. 4 time? 5 He was. Α. 6 For what? Ο. 7 He had, he had gone to a trial Α. 8 hearing. It was a Muslim rape gang. I think there was like seven men, if I recall 9 correctly, that were on trial. They had 10 11 already, they had already been like convicted or something like that. Like the verdict 12 13 came down and now they were like going to 14 sentencing I believe. And so Tommy went and 15 he checked on the door to see if there were 16 court reporting restrictions because their 17 rules are clearly different than ours, and he 18 didn't see any on the door. He actually went 19 in the office and asked if there was any 20 court reporting restrictions. They said they 21 weren't aware of any. 22 So, in the amount of five hours, he 23 was reporting, the police came, they arrested him on contempt of, I'm sorry, disrupting the 24

		Page	264
1	peace originally was what they told him he		
2	was charged with when they picked him up, and		
3	then in the matter of five hours, he was		
4	charged and no jury trial. And they changed		
5	his thing to contempt of court, and contempt		
6	of court doesn't need a jury. And so they		
7	imprisoned him for asking these defendants		
8	how they felt about their verdict and		
9	videotaping them.		
10	And he was sentenced to I think it		
11	was like 18 months or something crazy in		
12	prison, and because the prisons are heavy		
13	Muslim population, he basically wound up in		
14	solitary confinement for those months. I		
15	mean both times he was in he was in solitary		
16	confinement and he was by himself. So it was		
17	really like a torture sentence for this		
18	violation of court reporting restrictions,		
19	although they didn't comply with their own		
20	thing, so and all he was doing was asking		
21	these people, you know, whatever.		
22	So, end of story, that's why he was		
23	in prison and that's why we threw a		
24	demonstration. Because, clearly, he didn't		

Page 265 1 do anything wrong, and he was -- and later, 2 he was found innocent of those charges, so --3 O. Okay. Just for my own ignorance, and 4 please forgive that, but what is a Muslim 5 rape gang? 6 So there are these rape gangs in Α. 7 England called grooming gangs, and they are 8 majority Pakistani Muslim gangs. I mean it's a thing there. 9 There's a town in Rotherham where 10 11 there were, there was like 3,000 Muslims in 12 the whole town, there were like 3 percent, 13 3,000 Muslims in the whole town, yet 1,700 girls were victim to this and I think there 14 15 was over 700 men participating in this rape gang, and -- it was 14, I'm sorry, 1,400 16 17 girls were sexually exploited. 18 So these grooming gangs, as they 19 called them, they lure girls into like pizza 20 and chicken shops, because like they own 21 these pizza and chicken shops, they give them 22 drugs, they give them whatever, and then they sexually abuse them, they call them infidels 23 and they -- it's religiously-based a lot of 24

		Page	266
1	it and they exploit these young girls as		
2	young as ten-years old, and it has been		
3	covered up in the United Kingdom for quite a		
4	while now. And it's finally being reported		
5	on, but it's only being reported on because		
6	Tommy Robinson really like highlighted a lot		
7	of it. You can look it up.		
8	Q. I can hear it in your voice. This is		
9	a cause you're passionate about, yes?		
10	A. Yes. I don't want to see any little		
11	girls get raped.		
12	Q. Sure. But I mean your support of		
13	Tommy Robinson in speaking out against this		
14	is something you're passionate about, yes?		
15	A. Yes.		
16	Q. Okay. So you reach out to Danny		
17	Tommo and you tell him, "We have money. We		
18	want to help you, we want to help you with		
19	your rally"?		
20	A. Right. And he said that he had		
21	reached out to like Raheem Kassam. Because		
22	Raheem has done stuff with, the same Raheem		
23	from AIPAC, that Raheem had done stuff with		
24	Tommy in the past. He did like a free speech		

```
Page 267
1
     event once and -- but he couldn't get
2
     anywhere. And I was like, "Well, I know him.
3
     We can put you in touch with him. We can get
4
     line-up speakers, and we did a" -- like, and
5
     that was what we were charged to do.
6
             So who was in, for MEF, on MEF's
       Q.
7
     side, who was in charge of finalizing the
8
     deal with --
9
       Α.
             Gregg.
             -- Tommy Robinson?
10
       Ο.
11
             Gregg is in absolute charge of every
       Α.
12
     decision that is made there.
                                   If Gregg
    doesn't want it to happen, it doesn't happen,
13
14
    period.
15
             So it was Gregg's decision to send
16
     money to Danny Thomas?
17
             100 percent.
       Α.
18
             Okay. Was there a contract with
       Q.
19
     Thomas --
20
       Α.
             There was a grant agreement. Marnie
21
     drew that up. I had nothing to do with that.
22
     That was all Gregg and Marnie.
23
             Did you ever see it?
       Q.
             No. I didn't, I like didn't -- I
24
       Α.
```

		Page 268
1	think I might have e-mailed it to Danny or	
2	something like that, but I never even read	
3	it.	
4	Q. Okay. Do you know if it detailed	
5	what the monies were to be used for by	
6	Thomas?	
7	A. I don't know if the grant agreement	
8	said that. However, when we were in	
9	communication with Danny, I had asked him via	
10	e-mail like, you know, "Give me a breakdown	
11	of what everything will cost and get me, you	
12	know, like the information", and he gave me	
13	all of that, it had a number on it, it went	
14	to Gregg, Gregg approved it, end of story.	
15	Q. Do you know how much money went from	
16	MEF to Thomas?	
17	A. I feel like it was 30,000. It might	
18	have been, it might have been 20. I don't	
19	remember exactly.	
20	Q. Does 32,000 sound right?	
21	A. It sounds about right. I think	
22	because when I think that why I'm thinking	
23	20 is because pounds versus dollars.	
24	Q. When was the first time you went to	

```
Page 269
1
    London in connection with Tommy Robinson?
2
             I went for that demonstration I think
3
    it was June, the demonstration that was on
4
    June 9th I believe. I'm not exact, --
5
                   MR. CARSON: Object.
6
                   THE WITNESS: -- but June.
7
                   MR. CARSON: I just wanted to
8
            put an objection on the record with
            the characterization of "in
9
            connection with Tommy Robinson", but
10
11
            go ahead.
12
                   THE WITNESS: Okay.
    BY MR. CAVALIER:
13
14
       Q. And your answer to that question was
15
    June of 2018?
16
            I believe so, yes.
17
         Okay. Did you meet Danny Thomas
       Q.
    during that trip?
18
19
            Briefly. I met him for all of
      Α.
20
    30 seconds.
21
         What did you talk about?
22
      Α.
            Nothing. I said hi, he thanked me, I
23
    thanked him for, you know, pulling it off,
    and that was it.
24
```

Page 270 1 He went up on stage. He was talking. 2 Tricia and I hung in the back. We went on stage like once to look at the huge crowd, 3 4 and we really hung out with Raheem that 5 entire time. 6 You hung out with Raheem the entire Q. 7 time you were in London for that first time 8 in June of 2018? 9 Yes. Like, so like Raheem would hang back and like talk to us because he was the 10 11 only person we really knew. We didn't know 12 anybody. Like I think I met Tommy's cousin 13 for like a brief couple seconds. I met Geert 14 Wilders. I met Gerard Batten. He's a member 15 of Parliament. 16 0. Did you --17 I -- I'm sorry. The phone was ringing. I met like --18 19 Ο. Did you --20 You know, like that event was so 21 crazy. I mean we had 25,000 people there. 22 They were like banging on the gates of 23 Ten Downing. We had to like tell, I had to tell Raheem to grab the mike and tell 24

Page 271

everybody to like calm down and relax. And I
just hung back and like just watched the
event. It was unlike anything I had ever
seen before in my entire life.

- Q. Were the elements of the demonstration that you expected to be there that were supposed to be paid for with MEF's funds actually present?
- A. They did have one issue about they couldn't get the television prompter or something in like that because of security they said. There was supposed to be like a big screen, and they couldn't get it done but that was because of the security.

What happened was there was like a counter-demonstration and they blocked off like a part of the road, and they couldn't get it to the demonstration. We actually had speakers that were having a hard time getting to the demonstration themselves. We had people that showed up super late because they couldn't get in either.

Q. During that trip, did you tell Raheem Kassam that you were concerned that Danny

			Page	272
1	Thomas	might have stolen money from MEF?		
2	A.	I didn't hear of Danny Thomas		
3	stealin	g money until December.		
4	Q.	December of what?		
5	A.	That year.		
6	Q.	2018?		
7	А.	Uh-huh.		
8	Q.	Okay.		
9		THE COURT REPORTER: Yes?		
LO	BY MR.	CAVALIER:		
L1	Q.	Did a person named Vinnie Sullivan		
L2	ever te	ll you that he thought Danny Thomas		
L3	might h	ave stolen money from MEF?		
L4	А.	So Vinnie Thom-, Vinnie Sullivan		
L5	said			
L6	Q.	Vinnie Sullivan.		
L7	А.	that Danny Thomas, said that Danny		
L8	Thomas	was, said that Danny Thomas was like		
L9	not doi	ng his part and that he cut him out		
20	and Vin	nie Sullivan wanted his own cut, like		
21	whateve	r it was, and he was like Vinnie		
22	Sulliva	n is like a total loser.		
23		Like I couldn't even understand half		
24	the wor	ds that he was saying and not because		

		Page 273
1	of his accent, because like he just was	
2	incoherent. And him and this guy Jan both	
3	said that they were cut out of the deal and	
4	that and that like apparently they were	
5	supposed to help with like merch or shirts or	
6	they were supposed to be able to speak, but	
7	then Tommy's family didn't want Vinnie	
8	Sullivan speaking. Because like his family,	
9	it came down from his family that they didn't	
LO	want him because he's like crazy and a	
L1	lunatic and weird, and apparently, he was one	
L2	of Danny's associates, right. So he was real	
L3	like crazy angry, and he was trying to	
L4	insinuate that the money that he was supposed	
L5	to get Danny took, but not any additional	
L6	money I don't believe.	
L7	Q. Okay.	
8	A. But that dude is crazy. And so then	
L9	we paid him to just shut up. Gregg did.	
20	Q. Who is "we"?	
21	A. Gregg made a payment to Vinnie	
22	Sullivan to go away.	
23	Q. For his merch?	
24	A. For his like, he said he like drew	

		Page 274
1	something up. I don't even know. But that	
2	was all discussed with Gregg, and Gregg paid	
3	him. I told Gregg every word that kid said,	
4	and Gregg paid him to go away.	
5	Q. But at that point in time, did	
6	Sullivan tell you that he thought Thomas	
7	misappropriated funds that were meant for	
8	Tommy Robinson?	
9	MR. CARSON: Objection. She	
10	just answered that question. You can	
11	answer. Go ahead. Asked and	
12	answered.	
13	THE WITNESS: He may have. I	
14	don't, I don't remember my	
15	conversations with him directly	
16	because they were so insane. But	
17	Gregg Roman was in-, was included on	
18	every, was included in that whole	
19	thing. Every word that that man said	
20	I told Gregg Roman.	
21	BY MR. CAVALIER:	
22	Q. Okay.	
23	A. And Gregg Roman paid him.	
24	Q. Did you facilitate the transfer of	

Page 275 1 the money from MEF to Thomas? 2 Α. What do you mean by "facilitate"? 3 Ο. Did you arrange for the transfer? 4 Α. They asked me for his bank details or 5 Marnie did, and I put him in connection with 6 Marnie. And then I think that there was some 7 issue with his bank account like receiving 8 the money because it was such a large amount, so I put him in contact with Marnie, and 9 Marnie and him did all that. 10 11 Okay. So was the rally a success? 0. 12 Α. It was. 13 0. Okay. It was. I definitely thought it 14 Α. could have been handled like a little better. 15 16 I felt like it was a little lost trust, to be 17 honest. And that is why for the second demonstration, which was I think on the 14th 18 19 of July, I suggested that Raheem be in charge 20 of all of that stuff because I felt like he 21 would be more organized than Danny was and 22 that he should get the money and everything should go through him and he should pay the 23 vendors and all of that stuff, and that's 24

Page 276

- 1 exactly what happened.
- Q. Did you view your time in England
- 3 during June of 2018 as work for MEF?
- 4 A. Not really. So that's why I wanted
- 5 | to go because I wanted to see what it was
- 6 like. I haven't travelled. Like, you know,
- 7 I'm interested in travel. And so I asked
- 8 Gregg if I could go, and he was like, "No,
- 9 there's no real reason for you to be there".
- 10 I'm like, "But I really want to see it",
- 11 blah, blah, blah, blah, blah. And I was
- 12 like, "I'm going to pay for my own ticket.
- 13 I'll just take off those days and I'll go".
- 14 And so Gregg reimbursed us, like
- 15 Tricia went too, and it was supposed to be
- 16 like 300 each, so 600 total. But I paid for
- 17 | my own hotel, my flights, any food, or
- 18 | anything that I did that time was mine. So
- 19 it was that one day I guess like I counted,
- 20 but since the rest of, they were only paying
- 21 for my, half of my flight, I figured I'll go
- 22 and have a good time the rest of the time.
- 23 And that's what I did.
- 24 Q. How long were you there for?

```
Page 277
1
             Three days I think. Three, four
       Α.
2
     days. Three days. Three nights, four days,
3
     something like that.
4
             Were you a salary employee at Middle
      Q.
5
     East Forum?
6
      Α.
             Uh-huh.
7
                   THE COURT REPORTER: Yes?
8
                   MR. CARSON: Yes?
     BY MR. CAVALIER:
9
10
            Yes?
      Q.
11
       Α.
          Yes. Yes. Yes. Yes.
                                     Yes.
12
             Okay. Did you have an allotment of
       Q.
13
     vacation time?
14
      Α.
             I did.
15
             Did you have to use your vacation
16
     time for that London trip?
17
             I don't remember. I think so.
18
             Do you ever remember discussing that
       Q.
19
     with Gregg as to whether you'd be charged
20
     vacation time to go to London?
21
             I think I said I was taking vacation.
22
     I'm almost, I'm almost sure that I did.
23
      Q.
             Okay.
             Because I think it was -- because we
24
       Α.
```

Page 278 1 were like, we were sightseeing, you know. 2 Like it wasn't -- there was only one day to 3 do work there. So I'm almost positive that I 4 had to take vacation. I'm not sure, but a 5 pretty good indicator. 6 Okay. And, again, I don't want to, I Ο. 7 don't want to characterize or mischaracterize 8 your testimony, but is it fair to say you viewed the trip as partly work, partly 9 vacation, mostly vacation, a little bit of 10 11 How would you describe that? work? 12 Α. Partly work, mostly vacation. 13 Ο. Okay. Okay. So the rally ends, you do some sightseeing, and then what, you come 14 15 back to the United States? 16 Α. Correct. 17 Do you have any further communications with Danny Thomas? 18 19 Just it was very friendly, like Α. "good job, nice to meet you", whatever, 20 21 whatever. And then when the second, like 22 when they wanted to do a second 23 demonstration, he reached out to us and -- or I forget what happened there, but -- I don't 24

Page 279 1 know if he reached out to us or -- yes, he 2 reached out to us. They were planning a 3 second one. 4 And then I asked Gregg if he wanted 5 to be involved, and he did. And we got go, 6 sort of go, and then Gregg told me I wasn't 7 allowed to go. They wanted to -- they were 8 going to fire Cliff, so they were going to throw him a bone and let him go to England. 9 And they were like, "Well, he has the better 10 11 connection with the congressmen", even though 12 he didn't make any of the meetings, he had no 13 idea who the meetings were, what they were. 14 I made all the meetings even though Raheem 15 was supposed to be charged with that. 16 And I didn't, I didn't go to that 17 So I didn't have any -- you know, I was just doing the thing. We had a limited 18 19 conversation with Danny Thomas about like 20 security and the plan, but really there 21 wasn't much there. 22 Q. Okay. So you didn't going to that 23 one? Uh-uh. 24 Α.

		Page 280
1	THE COURT REPORTER: No?	
2	THE WITNESS: No.	
3	MR. CARSON: Yes or no?	
4	BY MR. CAVALIER:	
5	Q. Were you upset that you didn't get to	
6	go?	
7	A. For a minute. Because like who	
8	doesn't want to go? It was amazing the first	
9	time.	
10	Q. Okay. You did ultimately go back	
11	though, yes?	
12	A. Yes.	
13	Q. When did that happen?	
14	A. So Tommy was being released from	
15	prison. He was released from prison, and	
16	then they called and they FaceTimed me to	
17	thank me for like, you know, helping them or	
18	whatever. Because I was the only contact	
19	information that they had, and they told me	
20	to thank Gregg and The Middle East Forum and	
21	Daniel Pipes and all that stuff.	
22	And then they said that they were	
23	having a dinner, and then they there was a	
24	court date, and they wanted us to come for	

		Page 281
1	that. Because there was going to be another	
2	rally and they were going to show their	
3	appreciation by having us at the dinner, and	
4	if I wanted to say a couple words, I could.	
5	And Gregg was talking about how they wanted	
6	me to speak and that, you know, he was	
7	going back and forth, vacillating, speak,	
8	don't speak, speak, don't speak. I don't	
9	know, it was like back and forth with that	
LO	the whole time.	
L1	And so I and so I went to I	
L2	said, "Do you want me to go to this one", and	
L3	they said, "Yes". And that one was a work	
L4	trip. That one was definitely a work trip.	
L5	Q. "That one" being October of 2018?	
L6	A. Yes.	
L7	Q. Okay. Who paid for that trip?	
L8	A. So they paid for, they paid for my	
L9	flight, they paid for my hotel, and they	
20	reimbursed me for transportation and food.	
21	Q. Okay. How long were you there for?	
22	A. I think it was three days, two nights	
23	or something, something very nominal.	
24	Q. Okay. Who went with you?	

ı			
			Page 282
1	Α.	My mom.	
2	Q.	Who paid for your mom to go?	
3	Α.	She did.	
4	Q.	Any particular reason why you brought	
5	your	mom?	
6	Α.	My mom had never been	
7		MR. CARSON: Lisa,	
8		THE WITNESS: And she liked	
9		Tommy and she was excited, and she	
10		said, "Can I go with you"? I said,	
11		"Sure, come with me. You'll stay in	
12		my room".	
13		MR. CARSON: Lisa, it seems	
14		like your arm is bothering you. Do	
15		you need a break?	
16		THE WITNESS: No, it's fine.	
17		Sorry, I'm picking. I'm just I'm	
18		tired.	
19		MR. CARSON: I just want to	
20		make sure you're okay. That's all.	
21		It looked like	
22		THE WITNESS: I'm fine.	
23		MR. CARSON: it was	
24		bothering you.	

Page 283 1 BY MR. CAVALIER: 2 So what did you do while you were Ο. 3 there? 4 Α. I went to the demonstration. We hung 5 out, like I hung out with a group of people. 6 You know, we did a press release. I had a, 7 we had a meeting on the phone. Like we had 8 some like conference calls even with Gregg back in England about like what the plan was 9 and the media release and all that kind of 10 11 stuff and being on the ground, meeting the 12 reporters, making relationships with the reporters because they still wanted -- there 13 was Ezra Levant from Rebel Media had pulled 14 in other reporters, like Cassandra Fairbanks 15 16 at the Gateway Pundit and Avi Yemini, and it 17 was like, you know, there was, there was 18 members of Parliament that came to speak, like Janice Atkinson. 19 20 And it was all about, you know, 21 networking, making those relationships with 22 the reporters, with the people, with -- doing 23 all those things on top of being at the demonstration, seeing how it went off and all 24

		Page 284
1	that stuff. But I don't know if MEF paid any	
2	money for that demonstration. I don't	
3	remember if they did or not. I don't think	
4	they did.	
5	Q. Was there any particular reason why	
6	you didn't bring your husband on this trip?	
7	A. Well, somebody had to watch the kids.	
8	Q. Okay.	
9	A. And my mom doesn't, my mom doesn't do	
LO	well with watching two kids at once. She	
L1	just started doing that for the first time	
L2	last week.	
L3	Q. During any of your trips to London,	
L4	did Gregg ever indicate a desire to go with	
L5	you?	
L6	A. No. Probably because he knew I	
L7	wouldn't sleep with him because of Israel.	
8.	Q. But he never indicated any such	
L9	desire?	
20	A. No.	
21	Q. Did you meet Danny Thom-, not meet,	
22	did you encounter Danny Thomas on this trip?	
23	A. I did.	
24	Q. How did you meet?	

		Page 285	
1	A. We were organizing going to the		
2	dinner and it was me, him and Avi, and we		
3	were all going to share a ride up to Bedford		
4	because it was far. First, we were going to		
5	take the train, but then the trains coming		
6	home at night, that wasn't like safe, so then		
7	we decided to take like an Uber up. So we		
8	all went together,		
9	Q. To dinner?		
LO	A me, my mom, Cassandra, Avi, Danny		
L1	and my mom, yes.		
L2	Q. To dinner?		
L3	A. Huh?		
L4	Q. To dinner?		
L5	A. To dinner.		
L6	Q. What was the dinner like? I mean		
L7	were you, were you the center of attention?		
L8	A. Not at the dinner, no.		
L9	Q. Okay. What was discussed at the		
20	dinner?		
21	A. Tommy just did a little speech		
22	thanking people, there was plenty there to		
23	thank, and then he was like taking pictures		
24	with people. And, you know, we were just all		

		Page	286
1	mingling for the most part.		
2	Q. Okay. So the dinner ends cordially.		
3	Do you see Thomas later?		
4	A. We all share a taxicab home. We		
5	tried to get an Uber, there weren't any, and		
6	then they finally had to call a cab. We had		
7	to call a cab.		
8	Then there was no like the guy		
9	wouldn't take our credit card. Then I had to		
10	like run around in like subway stations and		
11	like try to find an ATM to get cash out to		
12	pay the guy, but that just left me and my		
13	mom. We dropped Danny and Avi off at their		
14	places, Cassandra too, and then me and my mom		
15	went back to our hotel.		
16	Q. Did you go back out later?		
17	A. No.		
18	Q. You didn't see Thomas later that		
19	night?		
20	A. Nope.		
21	Q. Did you have drinks with Thomas and		
22	others after the dinner?		
23	A. Not after the dinner, no.		
24	Q. At any point during the day?		

Page 287 1 Not that day. Α. 2 At any point the next day? Ο. 3 The next day was the Α. Yes. 4 demonstration and Tommy got a good verdict 5 and we all went out to celebrate afterwards, 6 and my mom went back to her hotel room and it 7 was like all of us celebrating. We went to a 8 pub, Red Lion I want to say it is or something like that, right near Whitehall. 9 It was right around the corner from my hotel 10 11 room with my mom, my hotel with my mom. 12 Okay. And was your mother present at Ο. 13 that point in time? 14 Α. She was not. She showed up. like -- she was a little tired because it was 15 16 cold that day, so she went back to the hotel. 17 And then we were still out, and then she came and met us out and came back out and then she 18 19 went home. And then there was like a fight 20 about to break out or something like that, 21 and me, Danny and Tommy like went a different 22 direction. Because there was something 23 happening crazy. I forget what it was. Somebody started -- I think actually it was 24

Page 288 1 Danny starting a fight with somebody. Ι 2 don't even remember. 3 Anyway, we wound up going to this 4 other bar and like restaurant, and there was 5 like the security guys in Tommy's like inner 6 circle came over and we all hung out that 7 night. And it was like late and so they were 8 like, "All right, we got to get Tommy home", because I know this is where you're going 9 with it, "we want to get Tommy home", so 10 11 Tommy went home. And he was like, Tommy said 12 "make sure Lisa gets home okay" to Danny. 13 And so Danny had been like, you know, 14 flirting. Danny was flirting with everybody. 15 Danny was flirting with my mom. Danny was 16 flirting with everybody, right. But, anyway, 17 he was like flirting with me, and we were 18 walking back to go towards my hotel room. 19 was going to walk me to my spot. Because he 20 was apparently living in London at the time 21 at some like veterans thing, I don't know. 22 So he was walking and he grabbed my hand and it was in front of the cathedral and it's all 23 lit up and it was like very romantic, and I 24

Page 289 1 had drinks in me and I was definitely buzzed 2 100 percent and he kissed me. And I was just 3 like all thrown off by it in general, but I 4 knew that I like liked it at the moment. 5 Because, I don't know, I hadn't felt good in a long time, you know. So -- poor decision 6 7 again. So I -- so, anyway, he kissed me. 8 Nothing else happened. I went back to my hotel room. I talked to my mom. 9 I called, as soon as I got home -- we 10 11 left the very next day in the morning. I 12 called my -- I went home to my husband and I cried and was like, "Something is wrong. 13 This is what happened". He's like, "It's all 14 15 right. You're going through a phase. Your 16 work has been awful", blah, blah, blah, blah, 17 blah, and we talked about it and we talked about it for a while at length. And then, 18 19 you know, I said, "Well, then, you know, 20 something needs to change here with us or 21 something needs to go on", like, you know, 22 whatever. I was just in a very low mental 23 state, and for, you know, to have somebody think that I'm the world, it felt good. 24

		Page 291
1	don't know how to explain it, but I	
2	wasn't thinking clearly. I wasn't	
3	thinking about the things that I	
4	normally prioritize, which is my	
5	family and my kids. Like you know	
6	what I mean?	
7	Like I mean I was oh, at the	
8	time, I was just thinking like, "I	
9	just need to feel better". And it's	
10	very unlike me, it's terrible	
11	actually, and I've had a lot of guilt	
12	about it until this day.	
13	BY MR. CAVALIER:	
14	Q. Did kissing Thomas	
15	A. I can't be mad at my husband for	
16	anything because it's not his fault.	
17	Q. No, I'm not asking if you're mad at	
18	your husband. I'm asking you how your	
19	husband's reaction to this made you feel?	
20	A. I wasn't mad at him.	
21	Q. Did you wish he would have reacted	
22	more strongly?	
23	MR. CARSON: Objection.	
24	THE WITNESS: I don't know. I	

		Page 292
1	really don't know. I don't have a	
2	real answer to that.	
3	BY MR. CAVALIER:	
4	Q. Do you remember telling your	
5	therapist or your doctor that you wished he	
6	would have reacted more strongly?	
7	A. Maybe. I talk to my, I've been	
8	talking to my therapist about all kinds of	
9	stuff.	
LO	Yes, I mean Vasili my whole life, and	
L1	I don't know if this matters, like in	
L2	general, like he's such the calming factor.	
L3	He's always the one that's like, you know, if	
L4	I say somebody is like terrible, they're	
L5	like, "Well, their motivations are",	
L6	whatever. Like he likes to call it	
L7	compartmentalizing, right, but like he he	
8.	always like finds like the reasonable or	
L9	whatever. Like he and sometimes I wish	
20	that he wouldn't be always like super	
21	reasonable. Sometimes I wish that he, you	
22	know, would stand up and fight for me or	
23	stuff like that, yes. That's definitely like	
24	a thing. It's like a but it's a trait of	

Page 293 1 It's part of what makes him so strong 2 and good for me, and it's also a part of him 3 that, you know, makes me kind of feel like 4 I'm not as important to him as I should be. 5 And so, you know, it's like a conflicting 6 thing that I have with him. Because it's 7 what makes him good for me, and it's also --8 it's like a double-edged sword. So I can't say that I wish he would have maybe in a 9 time. 10 11 I've gone through a lot of emotions 12 since all this happened, and so it's a lot of 13 them that are very uncharacteristic for me. So I can't really -- I've vacillated between, 14 15 you know, being upset, being sad, being 16 angry. You know, it's all, it's all 17 different all the time. Because as I talk this out about like what happened to me at 18 The Middle East Forum, things become, you 19 20 know, like, you know, I can start to 21 identify, you know, what my real feelings I don't know if that makes sense. 22 are. 23 Do you feel like your husband's Q. reaction to your disclosure drove you to a 24

		Page 294
1	sexual relationship with Danny Tommo?	
2	A. Yes, probably.	
3	Q. And you did in fact begin a sexual	
4	relationship with Danny Tommo after this	
5	A. I did.	
6	Q disclosure?	
7	When did that start?	
8	A. December.	
9	Q. You didn't have any sexual contact	
LO	with Danny Thomas in October of 2018. Is	
L1	that true?	
L2	A. Other than that one kiss, no.	
L3	Q. Okay. What did you go to England in	
L4	December of 2018 for?	
L5	A. So it was a, that was a double thing	
L6	too. Tommy was, Tommy was interested in	
L7	and Tommy and I had stayed in communication.	
8	He valued my opinion on things, especially	
L9	political things and whatever. So he was	
20	talking about he was always interested in	
21	making a swing and turning like a little bit	
22	political, you know, where else was he going	
23	to go. He thought that it would be the	
24	greatest thing ever if he like, you know, got	

		Page 295
1	to be in the House of Lords or, you know, be	
2	a member of Parliament or European	
3	Parliament, and so he was talking about	
4	getting involved with Brexit and UKIP.	
5	And so UKIP was planning to do a	
6	Brexit march, and Tommy wanted my input on	
7	that because the other demonstrations had	
8	been successful and he asked me to come. And	
9	I also wanted to see Danny, clearly, and so	
10	it was both that I went.	
11	Q. And during that visit, you commenced	
12	a sexual relationship with Thomas?	
13	A. Uh-huh.	
14	THE COURT REPORTER: Yes?	
15	THE WITNESS: Yes.	
16	BY MR. CAVALIER:	
17	Q. Where did that occur?	
18	A. At my hotel.	
19	Q. Did you give Danny Thomas money	
20	during that trip?	
21	A. No.	
22	Q. Did you give him a loan for	
23	Christmas?	
24	A. I did. I gave him a loan, correct,	

Page 296 1 yes. 2 How much was the loan for? 0. 3 Α. It wasn't for Christmas. The loan 4 was because he needed to go, Tommy wanted him 5 to go to Germany or something like that and 6 he needed flights, he needed a flight out to 7 Germany or whatever, like one up and one back 8 or something like that. And so he said, "I need a favor". I mean I still have all his 9 text messages. And he screenshot it like a 10 11 thing, and he's like, "It's a little favor". 12 Like, "It looks like a big favor". And I 13 think it was like \$200 for a flight and 60 14 for a different, a little other flight back. 15 And so -- and I was like, "I need" --I was like, "I'll lend it to you only because 16 17 you have this money coming in through PayPal", which he showed me through a 18 19 screenshot that it wasn't cleared yet through PayPal but it was there, so like it needed 20 21 time to clear his account. And I said, 22 "Okay", and I said, "But" -- he said he would 23 pay me back by Thursday. I went "okay" and I lent it to him, and then he didn't pay me 24

Page 297 1 Typical. He's like, "It's Christmas". 2 I'm like, "It's Christmas for me too, pay me 3 back", and he didn't. That was it. 4 Did he ever pay you back? Ο. 5 Α. No. 6 Did you ever give him a credit card? Ο. 7 Α. No. 8 Did you ever give him access to your Q. credit card? 9 I did. One time when he was in 10 Α. 11 Brussels with me, he looked like such a poor 12 soul, and I was embarrassed that he was going 13 to be around the people that he was at. I said, "Go get yourself a jacket", like 14 15 a, what do you call it, like a blazer or 16 something, right. And he was like, "They're 17 not expens-", he's like, "if I go to this place, they're not expensive". And I was 18 19 like, "All right. Well, I have to hurry up 20 and get ready. Go". 21 So I gave him, I let him use my debit 22 card that day, and he came back and bought 23 himself extra stuff, awesome, and I was 24 like -- I yelled at him for that, and he's

		Page 298			
1	like, "I'll give you money back". And he				
2	gave me my card back and he never had access				
3	to it again, and I never gave him money after				
4	that again.				
5	Q. Between the first				
6	A. But I couldn't be, I couldn't be with				
7	him like dressed like he was in a				
8	professional capacity at all.				
9	Q. Between the first time that you				
LO	kissed Danny Thomas and the December of 2018				
L1	trip, did you were you in communication				
L2	with him?				
L3	A. Yes.				
L4	Q. Were those communications sexual in				
L5	nature?				
L6	A. They were romantic in nature.				
L7	Q. What do you mean by that?				
L8	A. He was like singing to me and being				
L9	sweet and cute and romantic. What do you				
20	mean what do I mean?				
21	Q. Were they sexual in nature?				
22	MR. CARSON: Objection. Asked				
23	and answered.				
24	THE WITNESS: I just answered				

		Page 299
1	that. They were romantic.	
2	BY MR. CAVALIER:	
3	Q. So I'm trying to understand the	
4	distinction between sexual communications and	
5	romantic communications.	
6	A. I'm trying to ask you what you mean	
7	by "sexual". I mean like he was like a guy I	
8	was dating.	
9	Q. So did you consider yourself to be	
LO	dating him at that point in time?	
L1	A. I was seeing him, yes. Yes.	
L2	We cons I considered that. He considered	
L3	that too.	
L4	Q. Okay. But at that point, you hadn't	
L5	had any sexual communications?	
L6	A. He told me he loved me, so	
L7	Q. When did that occur?	
L8	A. Multiple times.	
L9	Q. When was the first time?	
20	A. I don't know. When we were, on the	
21	first time, we were on a trip, we were in a	
22	car going to Huddersfield to interview a kid.	
23	Q. In October of 2018?	
24	A. No, December.	

```
Page 300
1
             Okay. When you went to London in
2
     December of 2018, did you assume that you
3
     would begin a sexual relationship with
4
     Thomas? Was that your intention?
5
             It wasn't -- it was my intention to,
6
     yes, like to -- I guess. I mean it wasn't
7
     like I just went there for sex. I mean
8
     please don't characterize it --
9
                   MR. CARSON: Objection.
                   THE WITNESS: -- like that.
10
11
     BY MR. CAVALIER:
12
             When did you find out that -- well,
       Ο.
13
     who is Jazmine Bishop?
14
             Danny's baby's mama.
      Α.
15
             Was she his fiancé also?
       0.
16
      Α.
             No.
17
             Was she his girlfriend?
       Q.
             Yes. Well, I didn't know that at the
18
       Α.
            When I met him, he was living in
19
     time.
20
     London in like that place, some VA thing.
21
             The first time I met him he was
     living in that whatever and he had said that
22
23
    he had broken up with her and he was -- not
     the first time I met him. When I met him,
24
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```
Page 301
1
     when I saw him in October, he was living in
2
     that place in London, and he said that he had
3
     broken up with her. He said it to me, my
4
    mom, Cassandra. I didn't think they were
5
     together anymore.
6
             Was that a true statement?
       Ο.
7
       Α.
             A true statement on his part?
8
      Q.
             Yes.
9
             Apparently not. Well, apparently,
       Α.
     they were I guess at the time.
10
11
                   MR. CARSON: Objection. Lisa,
12
            only testify what you know. Don't
13
            say --
14
                   THE WITNESS: Well, I don't
15
            know.
16
                   MR. CARSON: -- "apparently".
17
                   THE WITNESS: All I know is
18
            that I think that they were broken up
            when I met him, and I think they got
19
20
            back together while I was seeing him
21
            but I did not know that.
22
     BY MR. CAVALIER:
23
             Okay. Did you later come to find out
       Q.
     that they were not in fact broken up?
24
```

			Page	302
1	A.	Oh, yes.		
2	Q.	Okay. How did you find that out?		
3	Α.	Jazmine started harassing me.		
4	Q.	Okay. Harassing you about what?		
5	Α.	Danny.		
6	Q.	And your relationship with him?		
7	Α.	Yes.		
8	Q.	How was she harassing you?		
9	Α.	She would call me names, call like		
LO	make fa	ke accounts on Twitter, on Instagram,		
1	on Face	book. She was incessant. She would		
L2	call me	e all the time. She would message me.		
L3	She wou	ald message Vasili. She would she		
L 4	was a p	sycho. She was just crazy.		
L5	Q.	She reached out to your husband?		
L6	A.	Yes.		
L7	Q.	How often would this occur? I mean		
L8	was it	a daily thing, a weekly thing?		
L9	A.	Daily and weekly. Like she would go		
20	on a ra	nt for like, you know, a couple days		
21	and the	n she would give it a rest for a week		
22	and the	en she'd start up again. I mean she		
23	was doi	ng this for two years, even when I		
24	tried t	o be nice to her.		

		Page 303
1	I tried to be so nice to that girl.	
2	I told her to get an education. I would help	
3	her find a school there, you know, grant	
4	programs that would like help her get	
5	educated so she wouldn't be in this situation	
6	that she was.	
7	She cried to me. She talked to me	
8	about her mom. She was crazy.	
9	Q. That seems like it would be pretty	
10	upsetting to you?	
11	MR. CARSON: Objection.	
12	THE WITNESS: Why would it be	
13	upsetting? The only part that was	
14	upsetting to me is when	
15	MR. CARSON: Lisa,	
16	THE WITNESS: Sorry.	
17	MR. CARSON: Objection. Facts	
18	not in evidence. Object to form.	
19	Argumentative. You can answer.	
20	MR. CAVALIER: I'll rephrase	
21	the question.	
22	BY MR. CAVALIER:	
23	Q. You said she was harassing you for	
24	two straight years. Did that upset you?	

		Page 304
1	A. It was annoying.	
2	Q. Did it upset you?	
3	MR. CARSON: Objection. Asked	
4	and answered.	
5	THE WITNESS: It was annoying.	
6	That's all it was, annoying.	
7	BY MR. CAVALIER:	
8	Q. Was it a minor annoyance?	
9	MR. CARSON: Objection. Asked	
10		
11	THE WITNESS: Minor.	
12	BY MR. CAVALIER:	
13	Q. Was it a minor annoyance or a major	
14	annoyance?	
15	MR. CARSON: Objection.	
16	THE WITNESS: Minor annoyance.	
17	BY MR. CAVALIER:	
18	Q. So how did you respond to that minor	
19	annoyance?	
20	A. In the time, there were times where I	
21	yelled and screamed at her. There were times	
22	where I ignored her. There were times when I	
23	blocked her. There were times when there	
24	were all different times. There were times	

		Page 305
1	where I tried to talk to her nicely. There	
2	were times where I tried to coach her and	
3	help her and be a friend to her. We even	
4	hung out once.	
5	Q. All right. Can you see that	
6	document?	
7	A. Yes.	
8	Q. Do you recognize it?	
9	MR. CARSON: It is what it is.	
10	THE WITNESS: It's either	
11	something I wrote to her or she wrote	
12	to me. I would have to see the	
13	whole,	
14	MR. CARSON: Take a minute.	
15	THE WITNESS: I would need	
16	to see the whole thing. I can	
17	probably find it.	
18	MR. CARSON: Take a minute.	
19	No, no, Lisa, put your phone	
20	down. You're not going in your phone	
21	today. All right? You're not	
22	THE WITNESS: Well, I would	
23	like to see the rest of the context	
24	of that. Because there's got to be a	

			Page	306
1		lot of more context to that.		
2	BY MR.	CAVALIER:		
3	Q.	Well, you have messages from Jazmine		
4	Bishop	in your phone?		
5		MR. CARSON: Objection. She's		
6		not I'm instructing her not to		
7		answer that question. All the text		
8		messages in her phone were turned		
9		over through Cornerstone.		
10		Lisa, put your phone away.		
11		Don't reference it again. Okay? And		
12		take a minute, look at the document,		
13		and then answer his questions about		
14		the document and only the document.		
15		THE WITNESS: I don't know if I		
16		wrote that to her or she wrote that		
17		to me, but it was probably a		
18		conversation between the two of us.		
19	BY MR.	CAVALIER:		
20	Q.	Have you looked at your phone while		
21	we've }	peen doing this deposition today?		
22	Α.	No. Only the one time it rang and I		
23	put it	down.		
24	Q.	You haven't read text messages today?		

		Page 307
1	A. No.	
2	Q. You haven't referenced notes today?	
3	A. No. Swear to God.	
4	Q. When we go back and look at the	
5	video, we won't see you looking at your phone	
6	except that one time it rang?	
7	A. Correct.	
8	MR. CARSON: Objection. Not in	
9	evidence.	
10	MR. CAVALIER: I'll ask the	
11	question again. I don't see a basis	
12	for	
13	THE WITNESS: I said no, you	
14	will not see me doing that. Because	
15	I didn't do it.	
16	BY MR. CAVALIER:	
17	Q. No. I want to ask the question as to	
18	whether you have communications with Jazmine	
19	Bishop on your current phone.	
20	MR. CARSON: Objection. All	
21	the communications that are on her	
22	phone between her and Jazmine Bishop	
23	have been turned over.	
24	MR. CAVALIER: That's not my	

		Page 308
1	question, Seth. I want to know if	
2	she has examples of this on her phone	
3	still.	
4	MR. CARSON: Okay. You guys	
5	have equal access to everything	
6	that's on the phone as she does and	
7	that I do. All right? All the	
8	exhibits were turned over to	
9	Cornerstone.	
10	MR. CAVALIER: I understand	
11	your representation.	
12	MR. CARSON: So anything that's	
13	not so anything on her phone that	
14	wasn't turned over is deemed not	
15	relevant. If you guys want to make	
16	an argument about that to the Court,	
17	you can. She's not going to take her	
18	time and go through her phone today.	
19	THE WITNESS: What I don't	
20	understand is where is the rest of	
21	the context between this?	
22	BY MR. CAVALIER:	
23	Q. Well, we'll get to that. We just	
24	want to know if you recognize this statement.	

```
Page 309
1
       Α.
             "Well, we'll get to that"? That's so
2
     sneaky.
3
             My only question is to you: Do you
      Ο.
4
     recognize this statement?
5
                   MR. CARSON: Yes. Lisa, just
6
            take your time, read the document he
7
            puts in front of you, --
8
                   THE WITNESS: I just --
9
                   MR. CARSON: -- and answer
10
            questions about it.
11
                   THE WITNESS: Guys, I will
12
            repeat this again, it looks like
13
            something that I either said to her
14
            or she said to me.
15
     BY MR. CAVALIER:
16
            Well, seeing as it starts with
      Ο.
17
     "Lisa", --
             That could have been received. I
18
      Α.
     could have gotten that from her.
19
20
             Do you ever remember Jazmine Bishop
      Ο.
21
     calling you the biggest fucking loser that
     she's ever met in her entire life?
22
             Yes. Yes. She's called me
23
      Α.
     worse. She's called me a slag and a pathetic
24
```

		Page 310
1	ho. She's called me crazy things. She's	
2	called me worse than that.	
3	Q. But that was only a minor annoyance?	
4	A. That's in response to her attacking	
5	me.	
6	Q. But it was only a minor	
7	A. You didn't read the whole text	
8	string.	
9	Q. Let's go to the next one.	
10	MR. CARSON: Lisa, if he	
11	he's asking you just simple yes-or-no	
12	questions.	
13	THE WITNESS: Okay, fine.	
14	BY MR. CAVALIER:	
15	Q. Do you recognize this statement?	
16	A. Yes. That's definitely something I	
17	wrote.	
18	Q. Okay. So what did you mean by "she's	
19	on meds"?	
20	A. She's bipolar and is on heavy	
21	medicine because she's not stable.	
22	Q. So you say to her here, "You're the	
23	one that stays with somebody who physically	
24	beats you, asks you to get abortions and	

```
Page 311
1
     cheats on you, and you're the one that's sick
2
     in the head? You're a fucking mess".
3
      Α.
             It says, "And I will" --
4
                   MR. CARSON: Lisa, there's no
5
            question pending.
6
                   THE WITNESS: Well, he read it
7
            wrong.
8
     BY MR. CAVALIER:
9
       Q.
          What upset you so much that made you
     write this?
10
11
                   MR. CARSON: Objection.
12
                   THE WITNESS: She was harassing
13
14
                   MR. CARSON: Wait. Lisa, wait.
15
            Wait. Objection to the
16
            mischaracterization of the document,
17
            to the mischaracterization of my
            client's testimony. She already
18
19
            testified it was a minor annoyance.
20
            Lisa, you can answer.
21
     BY MR. CAVALIER:
22
       Q.
             Okay.
             She was annoying me by saying things
23
       Α.
     just like that to me, so I was responding.
24
```

			Page	312
1	Q.	Do you recognize this statement?		
2	Α.	Yes. I said that.		
3	Q.	That doesn't seem to me to be the		
4	kind o	f thing that somebody would say to		
5	someboo	dy who was being a minor annoyance, do		
6	you ag:	ree?		
7		MR. CARSON: Objection to the		
8		mischaracterization of my client's		
9		testimony. You can answer. Object		
LO		to form. Argumentative.		
1		THE WITNESS: When we say		
L2		"minor annoyance", okay, a minor		
L3		annoyance is something that could be		
L 4		I broke my foot, and in the time that		
L5		I broke my foot, it was extremely		
L6		painful. Is it a minor annoyance in		
L7		the grand scheme of life, yes.		
L8		However, it doesn't mean that I		
L9		wasn't upset at the time.		
20		So she's a, in the grand scheme		
21		of my life, she is a minor annoyance.		
22	BY MR.	CAVALIER:		
23	Q.	Do you see this as a rather extreme		
24	reacti	on to that kind of a minor annoyance?		

		Page 313
1	MR. CARSON: Objection.	
2	THE WITNESS: You're clearly	
3	leaving out all her communication	
4	that came before that. She started	
5	all of that, and she would not leave	
6	me alone. She was incessant, and	
7	this is one of the ways that I tried	
8	to make her go away.	
9	BY MR. CAVALIER:	
10	Q. Did the incessant-ness of her	
11	bothering you, as you put it, cause stress in	
12	your life?	
13	A. No.	
14	MR. CARSON: Objection.	
15	THE WITNESS: No.	
16	BY MR. CAVALIER:	
17	Q. So then it's fair to say that this is	
18	the kind of response you have to something	
19	that is not stressful to you?	
20	A. The time	
21	MR. CARSON: Objection.	
22	THE WITNESS: Why are you	
23	totally	
24	MR. CARSON: Objection.	

```
Page 314
1
                   THE WITNESS:
2
            -- mischaracterizing what I'm saying?
3
     BY MR. CAVALIER:
4
            I'm trying to figure out what you're
      Q.
5
     saying.
6
                   MR. CARSON: Objection.
7
            Argumentative. Object to form.
8
                   THE WITNESS: I'm going to tell
            you again --
9
10
                   THE COURT REPORTER: You're all
11
            on top of each other. Please.
12
                   THE WITNESS: Because --
13
                   MR. CARSON: Lisa, --
14
                   THE WITNESS: -- dishonest.
15
                   MR. CARSON: Lisa, listen, just
16
            take a breath and just -- he's --
17
            just listen to his question and
18
            answer his question.
19
                   THE WITNESS: Okay. Say it
20
            again, sir.
21
     BY MR. CAVALIER:
       Q. I said this strikes me as a -- I'm
22
23
     trying to understand your response to what
     you deem a minor annoyance.
24
```

			Page :	315
1	А.	And I'm going to say this one more		
2	time s	o that you can clearly understand it.		
3		MR. CARSON: There's no		
4		question pending.		
5	BY MR.	CAVALIER:		
6	Q.	So my question to you is: Doesn't		
7	this s	eem like a rather extreme thing to say		
8	to ano	ther person who is merely being a minor		
9	annoya	nce in the grand scheme of your life?		
LO		MR. CARSON: Objection. You		
L1		can answer.		
L2		THE WITNESS: In the moment, it		
L3		was extremely annoying. It was more		
L4		than extremely annoying. It was		
L5		harassment, okay. But after I get		
L6		done yelling at her, I go about my		
L7		normal day and try to forget about		
8.		her.		
L9		So, therefore, no, in the grand		
20		scheme of my life, she was a minor		
21		annoyance. In the heat of the		
22		moment, she was a major annoyance.		
23		Things are relative.		
24	BY MR.	CAVALIER:		

```
Page 316
1
       Q.
             Okay.
2
      Α.
             I would not call Jazmine Bishop a ma-
3
4
                   MR. CARSON: There's no
5
            question pending. There's no
6
            question.
7
     BY MR. CAVALIER:
8
             I didn't hear what you said. You
       Q.
     said you would not call Jazmine Bishop what?
9
10
       Α.
             Nothing.
11
                   MR. CARSON: You can answer.
12
                   THE WITNESS: Can we just
13
            continue, please? Go.
14
     BY MR. CAVALIER:
15
             Do you recognize this?
16
       Α.
             Yes. I said that. I think I -- I
17
     think that I said that though.
18
       Q.
             You did. This is not a text message.
19
       Α.
             Oh. Yes. Yes.
20
             You acknowledge saying that?
      Q.
21
      Α.
             Yes.
22
      Q.
             So help me understand. This is how
23
     you reacted to somebody who was, in your
24
     words, harassing you, correct?
```

		Page 317
1	MR. CARSON: Objection. We've	
2	asked we're now going in circles.	
3	It's asked and answered like seven	
4	times. Lisa, you can answer again.	
5	I object to form.	
6	Argumentative. Mischaracterization	
7	of prior testimony.	
8	THE WITNESS: Repeat the	
9	question.	
10	BY MR. CAVALIER:	
11	Q. This is how you react to somebody who	
12	was, in your words, harassing you?	
13	MR. CARSON: Same objections.	
14	THE WITNESS: This is how I	
15	react to a woman who is not my	
16	superior who has no influence on my	
17	work life harassing me, yes.	
18	BY MR. CAVALIER:	
19	Q. But Jazmine Bishop reached out to	
20	your boss, didn't she?	
21	A. Apparently.	
22	Q. So she did have at least some impact	
23	on your work life?	
24	A. They didn't care.	

		Page 318
1	Q. Why do you think they didn't care?	
2	A. Because they never brought it up.	
3	Q. Because they trusted you?	
4	MR. CARSON: Objection.	
5	THE WITNESS: I think that they	
6	don't care about anything that has to	
7	do with	
8	MR. CARSON: Lisa, there's no	
9	question.	
10	BY MR. CAVALIER:	
11	Q. If you were a marginal employee and	
12	you were getting random people from other	
13	countries calling your bosses and talking	
14	about affairs that you were having, wouldn't	
15	you expect your bosses to sit you down and	
16	say, "Hey, what's going on here? Why are we	
17	getting these calls"?	
18	A. I'm pretty sure that they could tell	
19	that she was clearly out of her mind.	
20	Q. So they never even talked to you	
21	about this?	
22	A. Nope.	
23	Q. They didn't bring it up?	
24	A. Nope.	

			Page	319
1	Q.	They didn't discipline you for it?		
2	Α.	Nope.		
3	Q.	Nothing?		
4	A.	Nothing.		
5	Q.	Okay. So when did you find out that		
6	Danny '	Thomas stole money from MEF?		
7		MR. CARSON: Objection.		
8		Objection. Assuming facts not in		
9		evidence. Mischaracterization of		
10		prior testimony. Argumentative.		
11		Object to form. You can answer.		
12		THE WITNESS: I, to this day,		
13		do not know if Danny Tommo stole any		
14		money from The Middle East Forum.		
15		Hand to my heart, God as my witness,		
16		I do not know.		
17		Jazmine had alleged that, and I		
18		asked her to prove it. She recanted		
19		it. I asked Tommy if he knew		
20		anything about it. He didn't. To		
21		this day, I have zero evidence, zero.		
22		Only innuendo or, not innuendo, only		
23		hearsay that that may have happened.		
24		I asked Danny about it. He		

			Page 32	20
1		told me "no". Everyone told me "no".		
2		She even recanted it. She actually		
3		even broke down in her recanting it		
4		that his mom bought his car and that		
5		his mom paid for the deposit on their		
6		house.		
7		So I have no idea to this day,		
8		hand to my heart, if he ever stole		
9		any money.		
10	BY MR.	CAVALIER:		
11	Q.	Do you recognize this document?		
12	Α.	I can't see it. There's something in		
13	the way	y. Hold on a second.		
14		MR. CARSON: Just take your		
15		time. Take ten minutes		
16		THE WITNESS: I'm looking.		
17		MR. CARSON: if you need it.		
18		THE WITNESS: I can't I have		
19		to move the thing to see it.		
20		MR. CARSON: Just take your		
21		time and read it. Just let him know		
22		when you're ready. Take as much time		
23		as you need.		
24		THE WITNESS: Yes.		

		Page	321
1	BY MR. CAVALIER:		
2	Q. What is this message?		
3	A. It's a message that I had with		
4	Jazmine. And that is exactly, if you look at		
5	the two, three text messages that come after		
6	it, when she recants it. I said "give me the		
7	evidence", and she said "no" and she took it		
8	back. So you don't have the full		
9	conversation.		
10	Q. You say "it was always in the back of		
11	my mind because it didn't add up, and the		
12	whole Vinnie and you thing". What did you		
13	mean by that?		
14	MR. CARSON: Objection. You're		
15	reading a snip-it of a text message.		
16	If you want to show her the full text		
17	message, you don't even know what		
18	she's referring to there, so I'm not		
19	going to let you like		
20	MR. CAVALIER: Seth, stop with		
21	the speaking objections. I'm asking		
22	her what she meant by her words.		
23	MR. CARSON: No. You're		
24	putting one snip-it of a conversation		

		Page 322
1	in front of her and trying to trick	J
2	her, and I'm not going to let you do	
3	that. So	
4	THE WITNESS: Right.	
5	MR. CAVALIER: So, if I	
6	understand your objection correctly,	
7	your objection is asking her what she	
8	meant by her words is trying to trick	
9	her?	
10	MR. CARSON: Yes. Because	
11	THE WITNESS: You're pulling	
12	out of context, and you know you are.	
13	MR. CARSON: If you want to	
14	give her a document, give her the	
15	complete document.	
16	BY MR. CAVALIER:	
17	Q. I'm asking you what did you mean when	
18	you said "it was always in the back of my	
19	mind because it didn't add up"?	
20	MR. CARSON: Objection.	
21	THE WITNESS: I have	
22	MR. CARSON: Impossible for her	
23	to it's impo I mean, unless	
24	you remember that conversation, Lisa,	

			Page	323
1		sitting here today, I don't know how		
2		you can answer these questions, but		
3		you can try I guess.		
4		MR. CAVALIER: Seth, that's a		
5		wildly improper objection.		
6		MR. CARSON: It's not. When		
7		you give someone a document, you		
8		don't give them half the document and		
9		then ask them to remember you're		
10		talking about something that happened		
11		a year and-a-half ago, and you're		
12		trying to trick the witness.		
13		MR. CAVALIER: She just		
14		referred to this conversation without		
15		the document. Now she remembers		
16		less		
17		THE WITNESS: When did I refer		
18		to the conversation		
19		MR. CAVALIER: because the		
20		document is in front of her.		
21		THE WITNESS: without the		
22		document? When did I do that?		
23	BY MR.	CAVALIER:		
24	Q.	When you told us that Jazmine		

```
Page 324
1
    Bishop mentioned it and then recanted it.
2
                   MR. CARSON: Objection. You
3
            can answer, Lisa. Go ahead. But I
4
            think that is improper --
5
                   THE WITNESS: Because -- wait a
6
            minute. Because the only time we
7
            ever talked about it was the only
8
            time she recanted it. That's all I
9
            remember.
                   Like what you don't get is I
10
            know that there is more to this than
11
12
            what is here, and that's what I was
13
            saying. So don't you dare
14
            mischaracterize me. That's --
    BY MR. CAVALIER:
15
16
      O. Look, this is how --
17
         That's dishonest of you.
      Α.
18
            This is how your attorney produced
      Q.
19
    the document. We didn't break these up.
20
                   MR. CARSON: You guys --
21
    BY MR. CAVALIER:
22
      Q. Your attorney produced the document
    this way.
23
            You guys have access to all my stuff.
24
      Α.
```

		Page 325
1	You have access to that whole conversation.	
2	And if I'm not mistaken, you get a search	
3	word and you get 50 words here and after it,	
4	right, before and after. So where is the	
5	50 words before and after your search term?	
6	Q. Believe me, the last thing you want	
7	to do is start talking about discovery during	
8	this deposition.	
9	Do you recall this conversation?	
LO	That is the question.	
L1	A. I don't believe anything you say.	
L2	You are representing somebody that you know	
L3	is reprehensible.	
L 4	MR. CARSON: Lisa, just stop	
L5	and listen to his question.	
L6	BY MR. CAVALIER:	
L7	Q. I'll rephrase the question. Do you	
L8	recall this conversation with Jazmine Bishop?	
L9	A. Not verbatim.	
20	Q. That's not my question. Do you	
21	recall having this conversation with Jazmine	
22	Bishop?	
23	A. I recall talking to her about some of	
24	this, yes.	

Page 326 1 Do you recall talking to her about 2 money that Danny Thomas misappropriated from 3 The Middle East Forum? 4 Α. I do. 5 MR. CARSON: Objection. 6 BY MR. CAVALIER: 7 What do you recall about that Ο. 8 conversation? Jazmine was very angry, and Jazmine 9 was saying all kinds of wild and outlandish 10 11 things. And I was trying to get her to give 12 me proof if that happened. Because I can't do anything without proof that it happened. 13 I can't just go wildly accusing people of 14 15 things if I don't have evidence of it, and so 16 I was trying to get Jazmine to get me proof. 17 And in that conversation to ask her to get me proof, she recanted. So there was no proof, 18 19 and there was nothing for me to do. 20 And I would, if I had proof, I would 21 definitely have a moral thing in my heart to 22 tell everybody, but I don't have any proof. 23 To this day, I do not have any proof. I asked her for bank statements. I've asked 24

Page 327 1 her for things. Never gave them to me. 2 But you suspected long before this Ο. 3 conversation --4 Α. No. I said that in a conversation so 5 that she would, so that she would be willing 6 to give me more information. 7 0. So you lied to her? 8 MR. CARSON: Objection. Mischaracterizes prior testimony. 9 Object to form. Argumentative. 10 BY MR. CAVALIER: 11 12 I'm trying to understand. Because 13 when I asked you about Vinnie earlier, you 14 told me that --15 There are plenty of things that I was Α. not completely honest with Jazmine Bishop 16 17 about. She's a lunatic. 18 Earlier, when I told, when I asked 0. you about Vinnie, you mentioned that he said 19 20 something to you about a concern with this 21 money that Tom, that Danny Thomas may have taken from the Middle East Forum. Now, in 22 23 this message, --And I told --24 Α.

		Page 328
1	Q. I haven't asked the question yet. In	
2	this message, you say "it", referring I think	
3	quite obviously to the money, "was always in	
4	the back of your mind because it didn't add	
5	up and the whole Vinnie"	
6	MR. CARSON: I'm going to	
7	THE WITNESS: That her and	
8	Vinnie.	
9	MR. CARSON: Wait, Lisa. I'm	
10	going to	
11	THE WITNESS: That her and	
12	Vinnie, her and Vinnie having a	
13	relationship.	
14	MR. CARSON: Lisa?	
15	THE WITNESS: Her and Vinnie.	
16	MR. CARSON: Lisa, just hang	
17	tight. All right? I'm going to	
18	object.	
19	THE WITNESS: He's taking this	
20	out of context. He's trying to piece	
21	two things together, but they're	
22	totally irrelevant.	
23	MR. CARSON: Taking the partial	
24	snip-it of a partial document out of	

		Page 329
1	context. Mischaracterization of	
2	prior testimony. Argumentative.	
3	Object to form. You can answer.	
4	BY MR. CAVALIER:	
5	Q. So what were you what do you mean	
6	when you say "it didn't add up"?	
7	A. Her rela	
8	MR. CARSON: Objection.	
9	THE WITNESS: I think what I	
10	meant was her relationship with	
11	Vinnie and all the back and forth	
12	that they were having.	
13	Because her and Vinnie had	
14	were like calling reporters and doing	
15	crazy stuff, I don't know. So right	
16	here, I'm trying to get information	
17	out of her so that I can tell the MEF	
18	if he did.	
19	BY MR. CAVALIER:	
20	Q. What was what were you referring	
21	to when you say "it was always in the back of	
22	my mind", right there?	
23	A. I don't know. I'd have to see the	
24	rest of the conversation.	

```
Page 330
1
             You don't think that -- the prior
2
     sentence says --
3
             I thought she had, I thought she had
      Α.
4
     an affair with --
5
                   MR. CARSON: Lisa, --
6
                   THE WITNESS: -- Vinnie.
7
                   MR. CARSON: -- let him finish.
8
     BY MR. CAVALIER:
          Where do you see --
9
       Ο.
             I don't know what that girl is doing.
10
11
    And I would like to, listen, I would like to
12
     see the rest of the conversation.
13
                   MR. CARSON: Just do me a
14
            favor, just take a deep breath. Just
            let's keep the record clean.
15
16
                   THE WITNESS: Because it could
17
            be referencing something from -- it
            doesn't mean it has to reference
18
            that. That's not like -- we --
19
20
                   MR. CARSON: Okay.
21
                   THE WITNESS: I would have --
22
                   MR. CARSON: No question --
23
                   THE WITNESS: I'm not done. I
            would have conversations and
24
```

		Page	331
1	reference		
2	MR. CARSON: No question		
3	pending.		
4	THE WITNESS: six lines back		
5	or forward.		
6	MR. CARSON: There's no		
7	question.		
8	So Jon is going to ask a		
9	question. You're going to take a		
10	minute and wait for me to object. If		
11	I don't object, you'll answer. If I		
12	do object, let me put my objection on		
13	the record,		
14	THE WITNESS: Fine.		
15	MR. CARSON: and then you		
16	answer.		
17	THE WITNESS: Sorry.		
18	MR. CARSON: And everyone just		
19	stay calm and just let's get through		
20	this. It's not a big deal.		
21	THE WITNESS: How many hours?		
22	MR. CARSON: I'm sorry. You		
23	have to sit for seven hours. It's		
24	been about five and-a-half hours.		

		Page	332
1	THE WITNESS: Oh, my God.		
2	Okay.		
3	BY MR. CAVALIER:		
4	Q. So the very, the very first line of		
5	this message, do you agree with me that the		
6	first line of this message says, "And I		
7	didn't know about the money that he took from		
8	MEF until you told me"? Did I read that		
9	correctly?		
LO	A. You did.		
1	Q. The very next word and phrase is		
L2	"it was always in the back of my mind".		
L3	Is it your testimony sitting here		
L4	today under oath that you don't believe that		
L5	the "it" in that sentence refers to the money		
L6	that he took from MEF?		
L7	A. I said I'd need to see the whole		
L8	context of the thing. I don't remember this		
L9	conversation verbatim. That's what I said.		
20	Q. I'm not asking you if you remember		
21	the conversation verbatim.		
22	A. You're asking me my opinion, but I'm		
23	not going to assume anything without the		
24	whole text.		

Page 333 1 Do you find it strange that the "it" 2 in that sentence in your mind could refer to 3 something that is not mentioned anywhere else 4 in this document? 5 It could. Because that's not a Α. 6 document. That's a piece of a document. 7 Ο. Fair enough. So is it at least fair 8 to say that as of Thursday, March 7, 2019, you at the very least suspected that there 9 was a possibility that Danny Thomas had 10 11 misappropriated money that belonged to The 12 Middle East Forum? 13 Let me just correct you. 14 MR. CARSON: Objection. You 15 can answer. 16 THE WITNESS: Let me just 17 correct you too because you're 18 misguiding my testimony. I told you that she first told me about that in 19 20 December, December. You just asked 21 me March. I already testified that she told me about it in December. 22 23 BY MR. CAVALIER: I'm not asking you what she told you. 24 Q.

```
Page 334
1
     And okay, fair enough, I'll ask the question
2
     that way.
3
             As of December 2018, did you at least
4
     suspect that there was a possibility that
5
     Danny Thomas misappropriated money from The
6
    Middle East Forum?
7
                   MR. CARSON: You can answer
8
            that.
9
                   THE WITNESS: Yes.
     BY MR. CAVALIER:
10
11
             What did you do about that?
       Ο.
12
             I asked Jazmine to provide proof, I
13
     asked Tommy Robinson if he knew anything
14
     about it, and I asked Danny Thomas himself.
15
     She recanted.
16
       Ο.
             So --
17
             Excuse me. I'm not done.
     recanted. She never provided me proof.
18
19
     Danny Thomas denied it, and Tommy Robinson
20
     said, "I was in jail at the time. I know
21
     nothing about it".
22
       Q.
             So the baby mama, as you put it, of
23
     the man who misappropriated the money told
24
     you --
```

```
Page 335
1
             We don't know that he misappropriated
2
     the money, and please stop saying that he
3
     misappropriated it because we don't know if
4
    he did or he didn't.
5
            All right, I'll rephrase. The baby
6
     mama,
7
                   MR. CARSON: --
8
                   THE WITNESS: What?
9
                   MR. CARSON: --
     BY MR. CAVALIER:
10
11
             -- to use your words, the baby mama
       Ο.
12
     of the man MEF alleges misappropriated this
13
     money tells you Danny Thomas stole the money,
     then recants it, and that's good enough for
14
15
     you?
16
                   MR. CARSON: Objection.
17
            can answer.
18
                   THE WITNESS: She said wildly
19
            outrageous lies about plenty of other
20
            people. So I wasn't really taking a
21
            scorned, crazy woman at face value.
22
                   And so no, I was not going to,
23
            I was not going to, you know, hurt
24
            MEF, I was not going to hurt Tommy
```

		Page 336
1	Robinson, all for some crazy girl	
2	who's already made up lies about like	
3	five other people. She made up lies	
4	about Archie. She made up lies about	
5	this one and that one and everybody.	
6	That's all she did.	
7	And she would call everybody.	
8	It wasn't just me she was harassing.	
9	She was harassing Tommy. She was	
10	harassing Archie. She was harassing	
11	all these people. Like the girl just	
12	lied all the time.	
13	So no, I wasn't going to take	
14	her at face value, I'm sorry. I'd	
15	need evidence to do that.	
16	BY MR. CAVALIER:	
17	Q. Did you talk to anybody else about	
18	your suspicion that Tommy, that Danny Thomas	
19	may have misappropriated money from The	
20	Middle East Forum?	
21	A. I might have talked to Twin about it.	
22	MR. CARSON: Objection.	
23	BY MR. CAVALIER:	
24	Q. You might have talked to Twin about	

		Page 337
1	it?	
2	A. Yes, I don't know if I did or not. I	
3	might have.	
4	Q. Do you remember the context of that	
5	communication?	
6	A. I just said I don't remember.	
7	Q. Do you remember	
8	A. I might have. I might have been on	
9	the phone with him. I talked to him on the	
10	phone a lot, I don't know.	
11	I might have talked to Archie,	
12	Shamus. I might have talked to a bunch of	
13	people about it. I was trying to figure out	
14	if he did or he didn't.	
15	Q. Why didn't you enlist MEF's help to	
16	find out if he did or he didn't?	
17	A. How would they know? And what's the	
18	point? You want me to drag them into baby	
19	mama drama over something that probably isn't	
20	true?	
21	Q. Well, you already told us that	
22	Jazmine Bishop injected the baby mama drama	
23	herself.	
24	A. She did.	

		Page 338
1		MR. CARSON: Wait. There's no
2		question yet. Just wait for a
3		question.
4	BY MR.	CAVALIER:
5	Q.	She was already, she was already in
6	it?	
7	А.	Not
8		MR. CARSON: Objection.
9		THE WITNESS: Not to me she
10		wasn't. Like they didn't, they
11		weren't hearing from her on the
12		regular. She wasn't harassing them
13		on the regular. She didn't say any
14		of that to them. Why didn't she tell
15		them that?
16		And here's another question, if
17		he did steal the money,
18		MR. CARSON: Wait. Just wait
19		for a question. Just answer
20		THE WITNESS: Fine.
21		MR. CARSON: A deposition is a
22		question-and-answer session.
23		THE WITNESS: I'm sorry. I'm
24		so annoyed.

		Page 339
1	BY MR. CAVALIER:	
2	Q. What's your question?	
3	A. I'm just so tired. I want this to be	
4	over.	
5	MR. CARSON: If you don't	
6	understand it, I object.	
7	BY MR. CAVALIER:	
8	Q. As an employee of The Middle East	
9	Forum, don't you think you have a duty to	
10	tell them about it if you suspect somebody	
11	stole their money?	
12	MR. CARSON: Objection. Calls	
13	for a legal conclusion. Objection.	
14	Calls for assuming facts not in	
15	evidence. Argumentative. Object to	
16	the form. You can answer.	
17	THE WITNESS: A, I was a	
18	low-level employee; B, I didn't know	
19	it to be true; and, C, I would have	
20	if I had proof that it happened but I	
21	don't, and I still don't to this day.	
22	BY MR. CAVALIER:	
23	Q. But that's not my question. My	
24	question is: As an employee, as somebody	

```
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1
     who -- a self-described very loyal person, --
2
             Uh-huh.
       Α.
3
             -- if you suspected that this money
4
     had been stolen, at least that it was a
5
     possibility that it had been stolen, don't
6
     you think you have an obligation to at least
7
     say, "Hey, we might have a problem here to
8
     your bosses"?
             I mean I definitely --
9
       Α.
                   MR. CARSON: Same objection as
10
11
            before. Go ahead. It's also asked
12
            and answered.
13
                   THE WITNESS: So morally, I
14
            think that if morally speaking, if
15
            that's what you're asking me as a
            loyal person, right, that if I
16
17
            thought, if I thought deep down in my
18
            heart that he did it, then yes.
                   But I don't. I don't even
19
20
            think he did it now.
21
     BY MR. CAVALIER:
22
       Q.
             Did you ever tell anybody else that
23
     you had heard these allegations and didn't
    believe them?
24
```

```
Page 341
1
             That was already asked, and I told
      Α.
2
     you that.
3
            I don't think I asked that question
      0.
4
     already.
5
                   MR. CARSON: You did. You can
6
            answer again if you want. I mean not
7
            if you want. You can answer.
8
                   THE WITNESS: I told people
            that I was concerned about it.
9
    BY MR. CAVALIER:
10
11
            Who did you tell that you were
      Ο.
12
     concerned about it?
13
             Tommy Rob- -- I just told you Tommy
    Robinson. I might have talked to Twin and
14
15
    people about it. I don't know. I talked
16
     about it though.
17
             I definitely went to Tommy Robinson
     about it. Definitely talked to Jazmine about
18
     it. Probably talked to my husband about it.
19
20
     I mean I'm a talker, can't you tell?
21
            You're aware, are you not, that Tommy
22
    Rob-, that Danny Thomas has admitted taking
23
     this money from MEF, correct?
            I did not know that.
24
      Α.
```

		Page 342
1	MR. CARSON: Objection.	
2	Assuming facts not in evidence. You	
3	can answer.	
4	THE WITNESS: But under what?	
5	Like is MEF making him pay it back?	
6	BY MR. CAVALIER:	
7	Q. That's not my question.	
8	A. I mean that's my question. I didn't	
9	know that, I didn't know that he admitted to	
10	taking it.	
11	Q. Okay.	
12	A. That's the first I'm hearing of it.	
13	Q. Have you read the transcript of a	
14	call between Gregg Roman and Danny Thomas in	
15	which he admits that?	
16	A. No. The only thing I got was a	
17	portion of a transcript that Daniel Pipes	
18	e-mailed me personally that talked about	
19	cocaine use.	
20	Q. Okay.	
21	A. That's all I have.	
22	Q. Have you read The Middle East Forum's	
23	counterclaim against you?	
24	A. I haven't, and I won't. Because I	

		Page 343
1	made my husband read it, and I hear that it	
2	was so outlandish that I didn't. And so no,	
3	I will not read that.	
4	Q. Same answer if I asked you if you	
5	looked at the exhibits to the counterclaim?	
6	A. I haven't looked at it.	
7	Q. So, based on what I've told you and	
8	that you now know having Danny Thomas admit	
9	to Gregg Roman that he took the money, does	
10	that change how you feel about the	
11	reliability of the evidence that you had	
12	prior to that?	
13	A. No.	
14	MR. CARSON: Objection. Still	
15	assuming facts not in evidence.	
16	Argumentative. Object to the form.	
17	BY MR. CAVALIER:	
18	Q. The fact that Danny Thomas admitted	
19	to taking the money is in evidence. Whether	
20	he did or he didn't, I'll grant you that,	
21	but	
22	A. Under what con	
23	MR. CARSON: Jon,	
24	THE WITNESS: Under a paid	

		Page 344
1	conversation with Gregg Roman?	
2	MR. CARSON: Lisa, let me	
3	handle it. He didn't admit to taking	
4	money. Gregg Roman offered to pay	
5	him money if he said he admitted to	
6	it.	
7	If The Middle East Forum is in	
8	the process of doing anything against	
9	Daniel Thomas for money Daniel Thomas	
10	stole, my client has no knowledge of	
11	that, but you can ask her questions	
12	about it still.	
13	MR. CAVALIER: So I'd advise	
14	MR. CARSON: As long as	
15	MR. CAVALIER: I'd advise	
16	MR. CARSON: I objected	
17	MR. CAVALIER: very careful	
18	making those kind of allegations on	
19	the video record here.	
20	THE WITNESS: Him or me?	
21	MR. CAVALIER: Especially when	
22	your witness has already admitted	
23	your only basis for it is the	
24	testimony of somebody that she	

			Page	345
1		herself deems unreliable		
2		MR. CARSON: First of all, I		
3		don't have to be careful. All right?		
4		I'm accusing Gregg Roman of offering		
5		money to Daniel Thomas based on the		
6		word of Daniel Thomas. That's the		
7		person he said it to. Okay? So		
8		and I've made those allegations on		
9		the record already so everyone here		
10		is aware of them, and everyone here		
11		is an agent of the party or a party		
12		themselves to the case.		
13		Furthermore, you're sitting		
14		there injecting facts into this		
15		deposition and then trying to ask my		
16		client questions about those facts.		
17		So, as long as we're injecting facts		
18		into the deposition, I think it's		
19		important that we keep everything in		
20		context.		
21		You can continue with your		
22		examination.		
23	BY MR.	CAVALIER:		
24	Q.	Ma'am, are you still there?		

Page 346 1 Yes. I just had to stand up for a 2 minute. My legs are bothering me. 3 All right. I think we need you at Ο. 4 least on the screen. 5 Did you ever tell Danny Thomas not to 6 talk to Gregg Roman? 7 Α. I've never -- I haven't spoken No. 8 to Danny Thomas since like Manchester. 9 Did you ever threaten him? 0. Threaten him how? No. I didn't 10 Α. 11 threaten anyone. 12 Did you ever threaten Jazmine Bishop? Q. 13 No, not that I can remember. I might 14 have said I'll like -- she threatened to beat 15 me up one time. I said I would like to see 16 her try or something like that. 17 But she threatened to beat me up. 18 She wanted to fight me. She said she was 19 going to fly over here or next time I was 20 here I better watch my ass. She threatened 21 me. 22 Did you ever threaten to sleep with 23 Danny Thomas again just to upset Jazmine Bishop? 24

			Page	347
1	A.	Probably said it jokingly in anger		
2	maybe.	I don't know. I don't remember		
3	saying	that, but I maybe.		
4	Q.	Is that the kind of thing you would		
5	typical	ly		
6	A.	Get under her skin.		
7	Q.	Is that the kind of thing you would		
8	typical	ly say as a joke?		
9	A.	I would never actually sleep with		
LO	Danny T	ommo again. Like that would be gross.		
L1	I don't	know, I also said the things I said		
L2	about a	bortion.		
L3	Q.	What makes it gross now?		
L4	Α.	What makes it gross now? He punched		
L5	me in m	y face and chipped my tooth.		
L6	Q.	Okay.		
L7	A.	That's what makes it gross now.		
L8	Q.	So let's talk a little bit about that		
L9	briefly	. Where did that occur?		
20	A.	Brussels.		
21	Q.	Why did you go to Brussels?		
22	A.	I went to Brussels because Janice		
23	Atkinso	n asked me to speak at a, to the		
24	Europea	n Parliament, and I was planning to		

		Page 348
1	until she told me that Alex Jones was going	
2	to speak and then I pulled out. And then she	
3	told me Alex Jones wasn't going to go and	
4	then I still had reservations about it, but I	
5	still went to watch the event.	
6	They were paying for my hotel room,	
7	not The Middle East Forum, Janice Atkinson	
8	did, and I paid for my own flights and my own	
9	everything out there. So it was a personal	
LO	trip.	
L1	Q. Okay. And so Tommy Robinson joined	
L2	you in Brussels?	
L3	A. No. He was originally invited to	
L4	speak and then he was dis-invited to speak	
L5	because they thought that they wouldn't let	
L6	him in the Parliament or something like that,	
L7	but he was flatboard (ph)	
L8	Q. So Tommy Robinson wasn't really a	
L9	part of that trip then?	
20	A. No.	
21	Q. But Danny Thomas was?	
22	A. I asked him to come join me.	
23	Q. Okay. And did he do so?	
24	A. Uh-huh.	

			Page	349
1	Q.	Why did you ask him to join you?		
2	Α.	Because I was seeing him then.		
3	Q.	Okay. Did you pay for him to make		
4	the tri	o?		
5	Α.	I don't remember. I might have paid		
6	for his	train or something like that. I		
7	don't kı	now. Maybe.		
8	Q.	Did you meet a woman named Amy		
9	Mekelbu	rg while you were in Brussels?		
LO	Α.	I did.		
1	Q.	Who is that?		
L2	Α.	She's a friend of mine.		
L3	Q.	What does she do for a living?		
L4	Α.	She helps people with wrongful		
L5	convict	ions, and she has a website called		
L6	RAIR tha	at highlights, that highlights the		
L7	interse	ctionality of Communism and Islamism.		
L8	Q.	Have you ever done any work for her		
L9	organiza	ation?		
20	Α.	I proofread her stuff and, you know,		
21	like th	ings you do for a friend.		
22	Q.	Have you ever tried to raise money		
23	for her	organization?		
24	Α.	She at one time so she is friends,		

		Page	350
1	she was already friends with David Horowitz		
2	and Adam Milstein. They're friends that		
3	she's had for like quite a long time. They		
4	follow her on Twitter and they have, and		
5	they've had regular communications.		
6	But they always asked her to submit		
7	like actual, you know, proposals, and she		
8	didn't know how to write them up. So I was		
9	trying to help her, you know, to do that.		
10	Q. Did you ever try to solicit money		
11	from MEF for her organization?		
12	A. She asked me to submit a proposal to		
13	Daniel Pipes, I helped her with it, and he		
14	lambasted it. He said it was juvenile I		
15	believe were his words. Sophomoric.		
16	Q. Do you ever		
17	A. It might have been "sophomoric". I		
18	can't remember.		
19	Q. Did you ever provide Amy Mekelburg or		
20	her organization with an MEF donor list?		
21	A. No.		
22	Q. Did you send her an MEF document,		
23	confidential document marked, a fund-raising		
24	document marked Confidential?		

			Page 351
1	Α.	Apparently I did.	
2	Q.	I'm asking you.	
3	Α.	No.	
4		MR. CARSON: Objection.	
5		THE WITNESS: At the time that	
6		I sent it, A, I didn't know it was a	
7		confidential document. I wasn't	
8		paying attention. I was just trying	
9		to like I just pulled one and	
10		said, "Look, this is how you write a	
11		proposal".	
12	BY MR.	CAVALIER:	
13	Q.	Okay. So you	
14	A.	At the time, I wasn't aware it was	
15	confid	ential.	
16		MR. CARSON: This is not the	
17		trade secret case. The scope of your	
18		examination, if it's going to go to	
19		the trade secret case, I did not	
20		prepare my client, and she did not	
21		prepare today for testimony on that	
22		case. So, you know,	
23		MR. CAVALIER: Well, two	
24		things.	

		Page 352
1	MR. CARSON: I don't think it's	
2	proper to question her knowing that	
3	there's another case to try to go	
4	after her in connection with that	
5	case when we're here today to talk	
6	about another case.	
7	MR. CAVALIER: So, if that's	
8	the extent of your objection, I'll	
9	respond by saying she acknowledged at	
10	the beginning of this deposition that	
11	she didn't prepare at all, so I don't	
12	think that's very valid, and	
13	secondly, I mean anything that may	
14	even lead me to evidence is	
15	permissible in this deposition. But,	
16	nevertheless, I won't belabor the	
17	point.	
18	BY MR. CAVALIER:	
19	Q. My point is, my question is this: Do	
20	you recall sending Amy Mekelburg a document	
21	called Foundations List?	
22	A. I made that. That wasn't an MEF	
23	document. I made that from the websites.	
24	Q. When did you make it?	

		Page 353
1	A. I don't remember. I was trying to	
2	help her with the thing, and it's all the	
3	information that I gave her was public access	
4	information. I gave her I even put like	
5	website links so she could check out the	
6	foundations on it. It wasn't an MEF	
7	document.	
8	Q. Is the amount of money that was on	
9	that document from MEF donors public	
LO	information?	
L1	A. Yes. Everything that is over I think	
L2	500, \$5,000, whatever, it has to be listed on	
L3	your 990.	
L4	Q. So were there donations on that	
L5	document that were in excess of \$5,000?	
L6	A. They were only in the excess of	
L7	\$5,000. All public information.	
8	Q. Did the document include reference to	
L9	e-mails that were in the public domain?	
20	A. I believe so.	
21	Q. Did it include reference to e-mails	
22	that were not in the public domain?	
23	A. I don't think so.	
24	Q. Where did you get the information	

			Page	354
1	that we	nt into the document?		
2	A.	On the websites.		
3	Q.	What websites?		
4	A.	The foundations' websites.		
5	Q.	What foundations?		
6	A.	I don't remember what they were off		
7	the top	of my head.		
8	Q.	The foundations that provided the		
9	money o	r the MEF website?		
10	A.	What?		
11	Q.	I'm trying to figure out		
12	Α.	The foundations that had the money.		
13	Q.	Okay. Did you include any		
14	informa	tion on that document that were not		
15	from th	ose websites?		
16	Α.	I don't believe so.		
17	Q.	During the trip to Brussels in 2018,		
18	did you	tell Danny Thomas that or did Danny		
19	Thomas	tell you that he was ending your		
20	relatio	nship?		
21	A.	No.		
22	Q.	He didn't tell you that he was ending		
23	the sex	ual relationship that you guys were		
24	carryin	g on?		

```
Page 355
1
                   MR. CARSON: Objection.
2
                   THE WITNESS: No. Actually,
3
            not even a little bit, no.
4
     BY MR. CAVALIER:
5
       Q.
             Okay.
6
             As a matter of fact, Danny --
       Α.
7
                   MR. CARSON: Again, --
8
                   THE WITNESS: Hold on.
                   MR. CARSON: -- referencing a
9
10
            document that was paid for or that
11
            someone offered to pay for, Jon.
12
                   THE WITNESS: But additionally,
            just so that you know, when I was in
13
14
            England in, for the Tommy Robinson
            MEP campaign, Danny tried to sleep
15
16
            with me then too and he tried to date
17
            me then too, and I told him "no".
18
                   So no, Danny Thomas did not --
            as a matter of fact, there were text
19
20
            messages from Danny where I tried to
21
            end it, and he goes, "I ain't going
22
            nowhere". He wasn't, he wasn't ever
23
            trying to leave me.
     BY MR. CAVALIER:
24
```

Page 356 1 So you told me he gave you a black 2 eye and chipped your tooth. How did that 3 happen? 4 Α. We were having sex. He was drunk. 5 We were having sex. I tried to push him off 6 He was smacking me. He didn't -- I 7 don't think he punched me. It was like his 8 hand, he was smacking me. I tried to push him off. I said, "Danny, it hurts. It's too 9 hard". 10 11 I had a cornea problem. I had an 12 I crawled to the ER by myself. He 13 got drunk and passed out. He didn't even --14 I was in there for like nine hours. He 15 didn't even come until the next day until I 16 woke him up and begged him to come get me 17 because I couldn't see. 18 And then he took care, like 19 technically took care of me like for the next 20 couple days because I couldn't see. Like he 21 helped me wash my hair and like did those 22 type of things because he blacked my eye and 23 chipped my tooth. How did you feel about that? 24 Q.

		Page 357
1	MR. CARSON: Objection.	
2	THE WITNESS: I think that I	
3	rationalized it in my head as like he	
4	was drunk and he didn't really	
5	understand how hard he was hitting	
6	me.	
7	And then it wasn't really I	
8	guess until later when Jazmine sent	
9	me all the pictures of how beat up	
10	she had been by him that I realized	
11	that like this is a common occurrence	
12	for him, and that really made me sick	
13	to my stomach.	
14	BY MR. CAVALIER:	
15	Q. So you took yourself to the hospital?	
16	A. I did. Well, I felt the way down the	
17	hallway and went down to the hotel lobby and	
18	I said, "I need an ambulance", and they put	
19	me in an ambulance.	
20	Q. They called an ambulance for you?	
21	A. They did.	
22	Q. Did you ever report that to anybody	
23	in authority?	
24	A. No. No. It's a very embarrassing	

		Page 358
1	thing. I didn't even tell my mom about it	
2	until the other day.	
3	Q. Did you consider it an assault?	
4	A. I, like I said, at the time, I	
5	considered it to be accidental. He was	
6	drinking and didn't realize his strength is	
7	what I took it to be at the time, and maybe	
8	that's why I wasn't as angry about it as I	
9	should have been at the time.	
LO	Q. Do you ever remember telling Tricia	
L1	McNulty that in a weird way you may be happy	
L2	that he punched you because he then took care	
L3	of you afterwards?	
L 4	A. He did take care of me after.	
L5	MR. CARSON: Objection.	
L6	THE WITNESS: I might have said	
L7	that. Because I was in a really bad	
L8	mental spot.	
L9	I mean think about that	
20	statement that you're just making.	
21	Think about that.	
22	BY MR. CAVALIER:	
23	Q. I can understand that.	
24	A. I was certainly not myself.	

		Page 359
1	MR. CARSON: No question.	
2	BY MR. CAVALIER:	
3	Q. Was the rough sex aspect of your	
4	relationship typical?	
5	A. No.	
6	MR. CARSON: Objection.	
7	Objection. I'm instructing her not	
8	to answer.	
9	BY MR. CAVALIER:	
10	Q. Where did you stay when you got out	
11	of the hospital?	
12	A. My hotel room.	
13	Q. And is that where Thomas was taking	
14	care of you?	
15	A. Yes. And then I got and it was	
16	only like a day or two after, I think it was	
17	a day after, maybe a day and-a-half, and then	
18	I went on a train to Amsterdam with my friend	
19	who met me there.	
20	Q. Okay. And how long were you in	
21	Amsterdam for?	
22	A. A couple days.	
23	Q. It's obviously a popular thing to do	
24	in Amsterdam, so I'll ask the question. Did	

		Page 360
1	you smoke pot while you were in Amsterdam?	
2	MR. CARSON: Objection. You	
3	don't have to answer.	
4	THE WITNESS: I don't have to	
5	answer that?	
6	MR. CARSON: You can I guess.	
7	I think it's a question designed to	
8	harass, embarrass and intimidate, but	
9	whatever. It doesn't matter.	
10	THE WITNESS: I mean I have no	
11	problem answering that because I told	
12	the guy I'll tell you the truth.	
13	I'll tell you that now. I tell the	
14	truth all the time. Pot makes me	
15	paranoid. It's something that I	
16	don't like, it's something that I	
17	don't like to do, right, and so	
18	and they always say that in Amsterdam	
19	they have pot that has a strain that	
20	won't make you paranoid, right.	
21	So I tried it in Amsterdam and	
22	it still made me freakin' paranoid.	
23	It was awful. It was the worst thing	
24	ever. And I was like, "They lied.	

			Page	361
1		They don't even have a strand of pot		
2		that makes you not paranoid like they		
3		said they would, and Amsterdam is		
4		supposed to have everything".		
5		So I did. I tried. I took two		
6		hits off the thing. I thought I was		
7		going to lose my mind. I was so		
8		paranoid that everybody was there		
9		laughing at me. I thought I		
10		dropped a French fry and I thought		
11		the whole place was staring at me.		
12		It was like the most awful,		
13		uncomfortable feeling in the entire		
14		world. That's it.		
15	BY MR.	CAVALIER:		
16	Q.	Did Danny Thomas accompany you to		
17	Amstero	dam?		
18	Α.	No. No.		
19	Q.	Who were you with?		
20	Α.	What?		
21	Q.	Who were you with again?		
22	Α.	Allison.		
23	Q.	Who is Allison?		
24	Α.	Teddy. Her name is Ingrid Allison		

```
Page 362
 1
     Teddy.
 2
             Okay. And she's just a friend of
       Q.
 3
     yours?
 4
       Α.
             Yes.
 5
                   MR. CAVALIER: Seth, I'm going
 6
            to -- I got some documents to do and
 7
            I'd like a minute to organize them.
 8
            So why don't we take -- it's almost
 9
            5:00. Why don't we take hopefully
10
            just ten or so, and then, you know,
11
            we can hopefully move this along
12
            close to the end.
13
                   Is that good with everybody?
14
                   MR. CARSON: Okay, yes. Sounds
15
            like a plan. Take your time. We'll
16
            get back on at -- what do you want,
17
            ten after 5:00, five after 5:00?
18
            It's up to you.
19
                   THE VIDEOGRAPHER: 4:55 p.m.,
20
            off the record.
21
22
                 (A recess occurred.)
23
24
                   THE VIDEOGRAPHER: 5:13 p.m.,
```

		Page 363
1	back on the record.	
2	BY MR. CAVALIER:	
3	Q. Have you had any conversations with	
4	Seth Carson today via phone or text?	
5	A. I've had conversations with him	
6	today, but	
7	Q. Tell me what you talked about.	
8	MR. CARSON: Objection.	
9	THE WITNESS: Uhm.	
10	MR. CARSON: Wait. You don't	
11	have to answer that. That's	
12	privileged.	
13	MR. CAVALIER: Seth, she's	
14	under oath on the witness stand, and	
15	you're having conversations with her.	
16	That's not privileged.	
17	THE WITNESS: Wait a minute.	
18	MR. CARSON: Yes, it is. Lisa,	
19	just stop. Every conversation I've	
20	had with her today has been	
21	privileged. We haven't discussed any	
22	testimony.	
23	MR. CAVALIER: Well, we're	
24	going to come back and revisit that.	

		Page 364
1	THE WITNESS: For the record,	rage 304
2	we haven't discussed any testimony.	
3	I asked her, I asked him how long	
4	this was going to be, and why	
5	MR. CARSON: No, Lisa. Stop.	
6	Lisa, we're not waiving any privilege	
7	right now.	
8	MR. CAVALIER: Like I said, we	
9	can revisit that later.	
10	MR. CARSON: We can revisit.	
11	I'll instruct her not to answer	
12	again.	
13	BY MR. CAVALIER:	
14	Q. Did you ever expect to receive	
15	\$100,000 commission by facilitating a meeting	
16	between Ezra Levant and Terry Giles in London	
17	in March of 2019?	
18	A. Uhm.	
19	MR. CARSON: Objection. Facts	
20	not in evidence.	
21	THE WITNESS: Do I answer?	
22	MR. CARSON: Yes, you can	
23	answer.	
24	THE WITNESS: So Ezra Levant	

		Page	365
1	I had met a man named Terry Giles in		
2	London through Tommy unrelated to MEF		
3	stuff, and when I met him, he's a		
4	very nice man and he was super		
5	interested in the work of Tommy and		
6	super interested in the work of Ezra.		
7	Ezra was looking to start a new		
8	branch in America and needed funding		
9	for that. And him and I talked, and		
LO	I was trying to desperately leave The		
1	Middle East Forum and I wanted to		
L2	and I said, "Listen, if I can pull in		
L3	a donor for you", who was Terry		
L4	Giles, unrelated to MEF, MEF never		
L5	talked to them before, never met them		
L6	before, "if I can make that happen		
L7	when I go to meet with him again,		
L8	would you be interested", yes.		
L9	So did he talk about a \$100,000		
20	commission? He said he had		
21	offered that. But really what I		
22	wanted to do was work for him. He		
23	also gave me the option to work, I		
24	could either be a journalist for them		

```
Page 366
 1
            or he also gave me the option to run
 2
            the whole thing.
 3
     BY MR. CAVALIER:
 4
             Okay. But just so the record is
       Ο.
 5
     clear, your answer to my question then as to
 6
     whether you were ever expecting a $100,000
 7
     commission for helping Ezra Levant raise a
 8
     million dollars to open an office is "yes"?
 9
             It's --
       Α.
10
                   MR. CARSON: Objection.
11
                   THE WITNESS: It's not a
12
            yes-or-no question. It was one thing
13
            he offered out.
14
                   Would I have taken that option,
15
            no. I wanted to work for him.
16
     BY MR. CAVALIER:
17
             Okay. So he offered you a $100,000
     commission, yes?
18
19
             I think it was that.
       Α.
20
                   MR. CARSON: Objection.
21
     BY MR. CAVALIER:
22
             Did you tell Daniel Pipes that he was
23
     a potential MEF donor?
             That who was?
24
       Α.
```

```
Page 367
1
       Q.
             Ezra Levant.
2
                   MR. CARSON: Objection.
3
            Assuming facts not in evidence.
4
                   THE WITNESS:
                                 No.
5
     BY MR. CAVALIER:
6
             Did you ever tell Daniel Pipes that
       Q.
7
     Terry Giles was a potential MEF donor?
8
       Α.
             I said that I --
9
                   MR. CARSON: Objection.
            Assuming facts not in evidence.
10
11
                   THE WITNESS: I said that I
12
            would like to get him to be a
13
            potential donor. I was going to try
14
            to, I was going to try to get him to
15
            donate to MEF as well as, as well as
16
            -- Terry Giles is a billionaire.
17
            was going to try to get him to donate
            to MEF and to The Middle East Forum.
18
            As a matter of fact, I would like
19
20
            Terry Giles to donate to Randy Weber
21
            right now.
22
     BY MR. CAVALIER:
23
       Q.
          And you told --
             He's a billionaire.
24
       Α.
```

		Page 368
1	Q. And you told that to Daniel Pipes,	
2	correct?	
3	A. Yes.	
4	Q. Who knew about your arrangement with	
5	Ezra Levant?	
6	MR. CARSON: Objection.	
7	Objection. Assuming facts not in	
8	evidence. What arrangement are you	
9	talking about?	
10	THE WITNESS: Yes. What	
11	arrangement?	
12	BY MR. CAVALIER:	
13	Q. All right, that's fair. So who knew	
14	about your, the discussion of the \$100,000	
15	commission?	
16	A. Probably	
17	MR. CARSON: Object.	
18	Objection. Assuming facts not in	
19	evidence. Object to the form. You	
20	can answer.	
21	MR. CAVALIER: Seth, if you	
22	want to put an objection to form on	
23	the record, why don't you just put an	
24	objection to form, and if I ask for	

		Page 369
1	clarity, you can give it to me?	
2	Otherwise, we'll just let your	
3	objection stand. Fair enough?	
4	MR. CARSON: I mean I'll put	
5	the objections on the record that	
6	I'm I'm going to state precisely	
7	my objection, why I'm objecting, and	
8	then the witness can answer after I'm	
9	done.	
10	BY MR. CAVALIER:	
11	Q. You can answer the question.	
12	A. I talked about the prospect of the	
13	commission, of working with them, of I	
14	even with lots of people, my mom, Tricia,	
15	lots of people. Because I'm so wanting to	
16	get out of the Middle East Forum. I thought	
17	that that would be a great opportunity for	
18	me.	
19	Q. Did you send Terry Giles a proposal?	
20	A. No, I never sent him	
21	MR. CARSON: Objection.	
22	THE WITNESS: I never sent	
23	Terry Giles a proposal. Terry Giles	
24	met with Ezra in a meeting with me	

		Page	370
1	and Ezra in England.		
2	BY MR. CAVALIER:		
3	Q. Did Tricia McNulty know about your		
4	discussions with Terry Giles?		
5	A. Some of them, yes.		
6	Q. Did Grayson Levy know about your		
7	discussions with Terry Giles?		
8	A. Most likely.		
9	MR. CARSON: What discussions		
LO	are you talking about here?		
L1	THE WITNESS: The discussions		
L2	about potentially working for Rebel		
L3	Media.		
L4	BY MR. CAVALIER:		
L5	Q. Did you ever ask any let me		
L6	rephrase. Did you ever ask Grayson Levy,		
L7	Tricia McNulty or Marnie Meyer to edit		
8.	documents that you gave to Terry Giles?		
L9	A. I don't know, I might have. That's		
20	something I would, something I would likely		
21	do. I value Grayson's opinion majorly. And		
22	Grayson was actually, I think Grayson was		
23	actually even helping with that. I think		
24	Grayson had, like was using it for some of		

		Page 371
1	his idea. I think that that's how it all	
2	started.	
3	I think that Grayson and Ezra talk,	
4	and he knew that Ezra was looking to do this	
5	and that I could be Grayson was trying to	
6	help me get out of MEF because he hates Gregg	
7	too.	
8	Q. Did you ever tell Daniel Pipes about	
9	the potential commission?	
10	A. Why would I? It's a separate deal.	
11	Q. Did you ever tell Daniel Pipes about	
12	your discussions with Ezra?	
13	MR. CARSON: Objection. What	
14	discussion?	
15	BY MR. CAVALIER:	
16	Q. When I say "discussions", do you	
17	understand that I'm talking about the	
18	discussions that we just talked about?	
19	A. Talking about me working for Rebel	
20	Media?	
21	Q. Yes, and the potential commission and	
22	your potential	
23	A. Fine.	
24	Q for employment with Rebel Media.	

```
Page 372
1
     Do you understand that that's what I'm
2
     referring to?
3
      Α.
             Okay, yes.
4
                   MR. CARSON: When you say --
5
            whatever. Objection. I think -- you
6
            can answer.
7
     BY MR. CAVALIER:
8
       Q. Did you --
9
                   THE WITNESS: There wasn't any
10
            question.
11
                   MR. CAVALIER:
                                  Yes.
12
                   MR. CARSON: Okay.
13
     BY MR. CAVALIER:
             Did you ever tell Daniel Pipes that
14
       Ο.
15
     you went to England with your children?
16
             Yes. He told me to say that.
       Α.
17
             What do you mean by that?
18
             He called me when I was in England
       Α.
     after the Guardian article was there, after
19
20
     the Guardian article came out, and he told me
21
     to specifically, when he came to my political
22
     affairs, to make sure it was very separate
23
     from Middle East Forum business because
     they're a 501(c)(3) and they can't be seen as
24
```

Page 373 1 political activ-, like politi-, like involved 2 in actually like political stuff like that. 3 And so -- so I said, "When I put in the 4 request, I made sure, like you told me to, to 5 put in that it was a vacation request". It 6 was the only time I've ever even actually I 7 think wrote a full vacation request out is 8 because they instructed me to. 9 And then when he saw me in England, when he saw the article that came out in 10 11 England, me on like my cell phone in the 12 picture, he called me, and he was very nice, very diplomatic. We talked about it on the 13 phone, and he was like, "Okay, we're just 14 15 going to make sure we tell the Guardian that 16 you were there, it was a private work trip, 17 you were with your family, blah, blah, blah, 18 blah, blah. 19 So then -- and then weirdly, he wrote me ba-, he wrote me like a week or two later 20 21 saying it again but in writing, and so I just 22 reiterated what we talked about on the phone back to him in that e-mail. I thought he was 23 24 covering his butt. So, yes, that's -- I

		Page 374
1	definitely did.	
2	Q. So you thought that as part of this	
3	disinformation about your purpose in England	
4	that	
5	A. Because they were trying to	
6	because he was worried	
7	MR. CARSON: Wait.	
8	THE WITNESS: Sure.	
9	MR. CARSON: Let him finish his	
10	question.	
11	BY MR. CAVALIER:	
12	Q. Right. Right. But what I don't	
13	understand is why part of that would involve	
14	telling that same thing to Daniel.	
15	A. Well,	
16	MR. CARSON: Objection.	
17	THE WITNESS: because I	
18	think that he wanted it in writing to	
19	cover his behind instead of just	
20	saying it was a conversation on the	
21	phone. Why else would he bring it up	
22	again in an e-mail unless to have it	
23	in writing to show the Guardian or	
24	who would ever come asking? Document	

```
Page 375
1
            it.
2
     BY MR. CAVALIER:
3
             Did you ever conceal your involvement
       Ο.
4
     in the Tommy Robinson campaign for European
5
     Parliament from Daniel Pipes?
6
       Α.
             Did I conceal it?
7
                   MR. CARSON: Objection.
8
                   THE WITNESS: Yes.
9
                   MR. CARSON: What's your
            answer, Lisa?
10
     BY MR. CAVALIER:
11
12
         Did you ever tell --
       Q.
13
                   MR. CAVALIER: Seth?
14
                   MR. CARSON: Did she answer?
15
                   MR. CAVALIER: Yes.
16
                   THE WITNESS: Daniel Pipes told
17
            me I could do what I wanted on my own
            time and that he was reluctant to
18
19
            like tell me what to do in my
20
            personal life. They frowned upon it.
21
     BY MR. CAVALIER:
22
       Q.
             Okay, so let's talk about that. Did
23
    he ever express to you that he was unhappy
     with your work for Tommy Robinson?
24
```

		Page 376
1	A. At one point, he didn't, he wasn't	
2	liking the coverage of the political part of	
3	it.	
4	Q. Okay. And what did you take that to	
5	mean?	
6	A. We had discussions in his office,	
7	him, me and Gregg, saying that I could do it	
8	on my own time as long as I was	
9	inconspicuous, so I was.	
LO	Q. Okay. So, if he gave you permission	
L1	to do it, why would you conceal it from him?	
L2	MR. CARSON: Yes, she never	
L3	testified that she concealed it.	
L4	That's what I'm saying.	
L5	THE WITNESS: No, I know	
L6	that	
L7	MR. CARSON: I think you	
8	THE WITNESS: No, I think that	
L9	you guys are all mischaracterizing	
20	like what happened. He gave me	
21	permission, they gave me permission	
22	to do it, right. Then they didn't	
23	like the Guardian thing, so then they	
24	said like keep it on the low. Like,	

		Page 377
1	he said, I think that his words were	
2	in an e-mail to me like, "I'm not	
3	happy with that. You know, you'd	
4	have to get it approved from me,	
5	blah, blah, blah, blah.	
6	But then again, after that,	
7	there was another conversation after	
8	he said that where he was like, "Do	
9	what you want on your own time.	
LO	Don't just as long as you're	
1	inconspicuous", so I was.	
L2	BY MR. CAVALIER:	
L3	Q. Did he ever revoke that permission?	
L4	A. Yes. And then he gave it to me	
L5	again, just like he did, just like he did	
L6	with the National Conservative Conference.	
L7	Same thing he did that to me then too. He	
L8	said I could go, and he said I could go, I	
L9	could do whatever I wanted, blah, blah,	
20	blah, blah. And then I go and he sees me	
21	there and he looks horrified that I'm there	
22	even though he gave me permission.	
23	So then Marc Fink writes me an e-mail	
24	saying, "You were we told you that your	

		Page 378
1	political activity was", blah, blah, blah,	
2	blah, blah, like this damning e-mail. And	
3	then I sent Marc back the screenshots of	
4	Daniel giving me permission, and then, oop,	
5	they stopped talking about it. Same thing.	
6	Same exact thing.	
7	Q. Did it upset you that Daniel was	
8	unhappy with your involvement in the Tommy	
9	Robinson campaign?	
LO	MR. CARSON: Objec	
L1	THE WITNESS: It was weird.	
L2	MR. CARSON: Objection.	
L3	THE WITNESS: It didn't upset	
L4	me because he was weird. He would	
L5	vacillate. One minute he would be	
L6	happy. One minute one time he	
L7	told me, "Good. Tommy needs good	
8.	people around him".	
L9	He also said to me, when we had	
20	that big conversation, he was shocked	
21	that Gregg Roman took my name off of	
22	the press release because why would	
23	you do that, you did all the work,	
24	right. He there was many of times	

		Page 379
1	where he praised my work with Tommy	
2	Robinson.	
3	So it was very conflicting with	
4	Dr. Pipes. Dr. Pipes would be the	
5	nicest gem to you on the phone and	
6	then say the weirdest, strangest	
7	things in e-mails, and he would go	
8	back and forth like that all the	
9	time,	
10	BY MR. CAVALIER:	
11	Q. Did you ever hold	
12	A all the time.	
13	Q. Did you ever hold yourself out as the	
14	Director of Communications for TR News while	
15	you were employed by The MEF?	
16	A. I volunteered. I worked for Tommy as	
17	a volunteer purpose, and that's the title	
18	that we used for my volunteer purposes to	
19	help Tommy to get media coverage.	
20	Q. Did you think that that was in	
21	accordance with Daniel Pipes' instructions	
22	about your involvement with Tommy Robinson?	
23	A. I changed my name. I was under	
24	for Middle East, as far as Middle East Forum	

		Page 380
1	was concerned, I was Lisa Barbounis. As far	
2	as Tommy Robinson was concerned, I never used	
3	the last name Barbounis, I only used	
4	Reynolds.	
5	Q. Why?	
6	A. So that it would be separate from	
7	MEF.	
8	Q. Did you ever discuss that separation	
9	by using different names with Daniel Pipes?	
LO	A. I told him that, yes.	
L1	Q. What did he say in response?	
L2	A. Nothing. He's like, "Okay. Just as	
L3	long as, you know, you don't involve The	
L4	Middle East Forum". I said, "All right". We	
L5	talked about that, 100 percent.	
L6	Q. Did your mother or father ever	
L7	express to you a fear that Gregg Roman would	
8.	have you killed?	
L9	A. Yes.	
20	Q. In what way?	
21	A. We were very worried about that when	
22	Daniel Pipes asked me to meet him at the	
23	train station. Everything they do is like	
24	covert and sneaky. I felt like it was	

Page 381 1 something out of a movie, "We'll meet at the 2 train station and sit at a booth and nobody 3 can listen, and it just needs to be me and 4 you". I mean it was like something out of a 5 spy movie. And Gregg is notorious for 6 hacking into e-mails and documents and crazy 7 stuff, and I wouldn't put anything past Gregg 8 Roman. 9 I'll tell you why I wouldn't put anything past Gregg Roman. Gregg Roman would 10 11 call us usurpers, right. After all this 12 happened, he called us usurpers. And we were 13 doing a radio show after all that happened, 14 and he said to me, right, when he was saying 15 it on the radio, he looked up at me knowing 16 that we knew he called us usurpers and he was 17 talking about something in Turkey and he goes, "All usurpers must be destroyed". Yes, 18 we were all scared. 19 20 Just to make it clear, for the Ο. 21 record, you've never observed Gregg Roman 22 engaging in violent behavior, correct? 23 Α. No. 24 MR. CARSON: Objection. Apart

```
Page 382
1
            from what she's already testified to,
2
            Jon?
3
                   THE WITNESS: True. Thanks,
4
            Seth.
5
                   MR. CAVALIER: Yes, Seth.
6
            We'll put you under oath next.
7
                   MR. CARSON: I mean --
8
     BY MR. CAVALIER:
             So, because he said, he called you
9
    usurpers and --
10
11
             "All usurpers must be destroyed".
      Α.
12
             Okay. Because he said "all usurpers
       Ο.
    must be destroyed", --
13
14
      A. And looked straight at me.
15
       Q.
          When did he say that?
16
             He said that at a radio event after
      Α.
17
    he left and came back.
18
             In what year?
       Q.
             2019, spring of 2019.
19
       Α.
20
             Okay. So approximately 15 months
      Ο.
21
     ago, Gregg Roman said, "All usurpers must be
22
     destroyed", and at some point, he may have
    hired a hacker --
23
             No. He is a hacker.
24
       Α.
```

Page 383 1 -- and that's why your parents were 2 afraid he would have you killed? 3 Α. There's more than that though. Like 4 Delaney, you don't think it's odd that 5 Delaney thought to go into a meeting with six 6 other people, including Gregg Roman, that she 7 needed to bring Mace? This is how this man 8 makes you feel. I don't know why Delaney did that. 9 10 I'm asking why you --11 I'm telling you that this man makes Α. 12 you feel like he's capable of anything, and he says all the time his enemies must be 13 destroyed. The dude, I don't -- I wouldn't 14 15 put it past him, not one heartbeat, not one 16 iota at all. I think that he's totally 17 capable of violence. 18 Did it concern you when your parents 0. 19 expressed a fear to you that Gregg Roman 20 would have you killed at this meeting with 21 Daniel Pipes? 22 Α. I -- it wasn't at the meeting. But 23 it was at the meeting with me and Daniel, yes. I definitely -- I had the same fear. 24

```
Page 384
1
             Did it upset you hearing your parents
2
     express that fear to you?
3
                   MR. CARSON: Objection.
4
                   THE WITNESS: No.
5
                   MR. CARSON: You can answer.
6
                   THE WITNESS: Why would that
7
            upset me?
8
     BY MR. CAVALIER:
9
             Did you ever record a phone call, one
     or more phone calls with Marnie Meyer without
10
11
     her knowledge?
12
             Did I record a phone call with Marnie
13
     Meyer without her knowledge? There was one
14
     conversation with Marnie where she was
15
     totally being what I considered to be out of
16
     control and, you know, acting like I was the
17
     one that was there, and to protect myself, I
     did. But I told Marnie that I did it.
18
19
             When did that occur?
       Ο.
20
             I don't remember. It was before, it
21
     was before November of 2018 I believe.
22
       Q.
             Where were you at that time?
23
       Α.
             At work.
             At The Middle East Forum?
24
       Q.
```

		Page 385
1	A. Correct.	
2	Q. Where was Marnie?	
3	A. Where was Marnie? On the phone. I	
4	don't know where she was. And Matt Bennett	
5	was in the office with me. Matt actually	
6	told me to record it.	
7	Q. But you didn't have her consent to	
8	record it at the time you recorded it,	
9	correct?	
10	A. No. I didn't say, "Marnie, I'm	
11	recording you".	
12	Q. Have you ever	
13	A. I didn't even know that that was not	
14	okay, honestly.	
15	MR. CARSON: Obje Lisa,	
16	wait for a question.	
17	THE WITNESS: Sorry.	
18	BY MR. CAVALIER:	
19	Q. Have you ever recorded your husband	
20	Vasili Barbounis without his knowledge?	
21	MR. CARSON: Objection.	
22	THE WITNESS: I record my kids	
23	without their knowledge too to play	
24	it back for my husband.	

		Page 386
1	BY MR. CAVALIER:	
2	Q. Well, that's not what I'm asking you.	
3	Have you ever recorded a phone conversation	
4	with your husband without his knowledge?	
5	A. No phone conversations, no.	
6	Q. Have you ever recorded a live	
7	conversation with your husband without his	
8	knowledge?	
9	A. He knows. I say, "I'm recording	
10	you".	
11	Q. Have you ever done it without	
12	notifying him first?	
13	A. I don't think so.	
14	MR. CARSON: Objection.	
15	THE WITNESS: I don't know.	
16	Maybe. Maybe not.	
17	I never started recording	
18	anybody until The Middle East Forum,	
19	by the way.	
20	BY MR. CAVALIER:	
21	Q. Did you ever record a phone	
22	conversation with Gregg Roman without his	
23	knowledge?	
24	A. No.	

			Page	387
1	Q.	Did you ever record an in-person		
2	convers	ation with Gregg Roman without his		
3	knowled	ge?		
4	A.	No.		
5	Q.	Did you ever record a phone		
6	convers	ation with Alana Goodman without her		
7	knowled	ge?		
8	A.	No.		
9	Q.	Did you ever record a phone		
LO	convers	ation, an in-person conversation with		
L1	Alana G	oodman without her knowledge?		
L2	A.	Absolutely.		
L3	Q.	Where did that occur?		
L4	A.	In D.C.		
L5	Q.	You were both physically present in		
L6	D.C.?			
L7	A.	Yes.		
L8	Q.	Why did you record a conversation		
L9	with he	r without her knowledge?		
20	A.	So that was the second time I ever		
21	hung ou	t with Alana Goodman. We were out for		
22	my frie	nd's birthday. And three men came up		
23	to the	bar to hit on all of us, and we said,		
24	"First,	what are you" they first said I		

		Page 388
1	said to them, "The first thing we need to	
2	know is are you Republican or are you	
3	Democrat", being funny. And they go, "Oh,	
4	no, we're Democrats, #MeToo". She laughed	
5	and she looked at me, she goes, "You know,	
6	I've only ever had a Me Too Movement once in	
7	my life, and it happened to be with your	
8	boss". And I said, "Excuse me". She said,	
9	"Yes". I said, "Come outside. I need to	
LO	hear this story".	
L1	So we went outside, and I recorded	
L2	it. Because I don't know her like that,	
L3	Number 1. I don't like you know, who	
L4	wants to get involved in lawsuits or legal	
L5	stuff? So I said "tell me the story" and she	
L6	did, and I recorded her.	
L7	Q. Why didn't you tell her ahead of time	
L8	that you were going to record it?	
L9	A. Because who wants to be recorded?	
20	Q. So you	
21	A. I didn't think she would be as honest	
22	if she knew she was being recorded.	
23	Q. Okay. Did Gregg introduce you to	
24	Alana Goodman?	

		Page	389
1	A. No. Raheem Kassam introduced me to		
2	Alana Goodman. The first time I ever met her		
3	was the first New Year's Eve party at Raheem		
4	Kassam's house. She came over. Raheem		
5	introduced me to her. I hung out with her		
6	that night and I hung out with her after		
7	that, and since then, we've become friends.		
8	Q. Do you know if Gregg Roman ever		
9	worked with Alana Goodman while he was at		
10	MEF?		
11	A. Apparently. It's on the recording.		
12	Q. Do you have any recordings of Gregg		
13	Roman in your possession, including, but not		
14	limited to, on your phone?		
15	A. No, I don't think so.		
16	Q. Did you ever record any conversations		
17	with Congressman Randy Weber without his		
18	knowledge?		
19	A. No.		
20	MR. CARSON: Objection.		
21	BY MR. CAVALIER:		
22	Q. Have you ever recorded any		
23	conversations with Ryan Coyne without his		
24	knowledge?		

		Page 390
1	A. No.	
2	MR. CARSON: Objection.	
3	THE WITNESS: There's actually	
4	an accidental recording of us at a	
5	thing, but I didn't do it. Like I	
6	didn't actually record him. He knows	
7	about that too.	
8	BY MR. CAVALIER:	
9	Q. I don't understand what you mean when	
LO	you say there was an accidental recording.	
L1	A. So there's like so I don't know	
L2	what happened but my phone was in the thing,	
L3	it recorded our conversation, and then like I	
L 4	don't even know what happened. And he has	
L5	it. Like because somehow it got to him.	
L6	I don't know, like we I definitely	
L7	think that I was hacked by Gregg Roman.	
L8	There was like all these conversations going	
L9	back and forth and they were deleting	
20	themselves, and some crazy stuff was	
21	happening with my phone, like whatever. It	
22	happened in realtime and Ryan saw it too, and	
23	we were both like "what is going on here".	
24	We were like freaked out, both of us. And so	

```
Page 391
1
     we were -- it was like a conversation that we
2
     were having. It was like a -- like I don't
3
     know why anybody would have taped that.
4
             But no. And Ryan knows that that
5
     exists or that it did exist, and there was --
6
     it doesn't matter. Like it was just us like
7
8
                   MR. CARSON: Objection.
                   THE WITNESS: -- at the casino.
9
    BY MR. CAVALIER:
10
11
             So, just so we're clear, and I want
       Ο.
12
     to back up for a second just so we're clear
13
     here, sitting here today, do you have any
     evidence that Gregg Roman hacked your phone?
14
             Do I have any evidence or do I
15
       Α.
16
     suspect him?
17
             Do you have any evidence that Gregg
     Roman hacked your phone?
18
19
                   MR. CARSON: Objection to the
20
            extent that it calls --
21
                   THE WITNESS: I'm not going
22
            to --
23
                   MR. CARSON: -- for a legal
            conclusion.
24
```

```
Page 392
1
     BY MR. CAVALIER:
2
             Sorry. Can you repeat your answer?
       Ο.
3
      Α.
             No.
4
                   MR. CARSON: I'm objecting to
5
            the extent that it calls for a legal
6
            conclusion. If you know the answer,
7
            you can answer.
8
     BY MR. CAVALIER:
          Have you ever recorded conversations
9
    with anyone in the Congressman's office?
10
11
      Α.
             No.
12
                   MR. CARSON: Objection.
13
                   THE WITNESS: Never.
14
    BY MR. CAVALIER:
15
             Have you ever recorded conversations
16
    with the former Chief of Staff --
17
      Α.
             No.
18
      Q. -- to the Congressman that you work
19
     for?
20
                   MR. CARSON: Objection.
21
    BY MR. CAVALIER:
22
      Q. Have you ever recorded conversations
    with Jeanette, the current Chief of Staff?
23
24
      Α.
             No.
```

```
Page 393
 1
                   MR. CARSON: Objection.
 2
     BY MR. CAVALIER:
 3
             In November of 2018, Gregg Roman's
       Ο.
 4
     job duties at The Middle East Forum changed,
 5
     correct?
 6
       Α.
             Yes. Kind of.
 7
       Ο.
             Well, he didn't come into the office
 8
     every day anymore, right?
 9
             Correct.
       Α.
             And that decision was made by Daniel
10
       Q.
11
     Pipes, correct?
12
       Α.
             I believe so, yes.
13
             And did Daniel Pipes seek your input
14
     into his decision-making process on that
15
     issue?
16
             I mean on face value.
17
                   MR. CARSON: Objection.
18
     BY MR. CAVALIER:
19
             I'm sorry, is that a "yes" or a "no"?
20
             On face value. I don't believe that
21
     like his seeking our advice was genuine.
     mean he was still getting advice from Gregg
22
     Roman which he told me he was. So yes and
23
24
     no.
```

Page 394 1 Did he ask you if you agreed with the Ο. 2 changes made to Gregg's work duties? 3 Α. Yes. It's in an e-mail. 4 MR. CARSON: Objection. 5 BY MR. CAVALIER: 6 And did you in fact agree with those Ο. 7 changes? 8 Α. As long as Gregg wasn't going to be around anymore and wasn't going to be 9 harassing me, yes, I was happy with that. 10 11 wanted to stay at The Middle East Forum if it 12 was going to be a healthy work environment. 13 I like their mission. 14 And you told Daniel Pipes that you Ο. 15 were on board with those changes, correct? 16 Yes, sir. Α. 17 While Gregg was out of the office, how was work at The Middle East Forum? 18 19 Better, honestly. Better. Much Α. 20 better. But Daniel, you could tell he was --21 he was struggling. Daniel was struggling. He's not an administrator. He admits that 22 23 he's not an administrator. He would say that to us he's not an administrator. He hates 24

Page 395 1 it. Tricia was struggling a little bit under 2 him. 3 You know, and you could feel that we 4 didn't, like you could feel that -- you know, 5 Daniel tried to hire somebody else and, you 6 know, we sat and had lunch with him, and he 7 asked us what we thought of the director and 8 you know, like he was trying to like -- he was floundering a little bit without a 9 director. And I could see that it wasn't 10 11 like, you know, working for Daniel, for the 12 Forum, for all of that, for a lot of people. 13 Matt, there was some like problems like with Matt and leaving and being a 14 15 direct-, he wanted to be a director or 16 something. I don't know, it was like a whole 17 hot mess without, you know, without Daniel having somebody he considered to be like in 18 the office, the adminis-, like being, having 19 20 us report to other than Daniel Pipes --21 A manager? A guy running the office 22 is what you mean, right? 23 Α. Exactly, yes. 24 Okay. Do you know if Gregg was Q.

Page 396 1 planning to leave The Middle East Forum at 2 this time? 3 Α. I don't know. 4 Do you know if he had any plans to Ο. 5 start his own organization around this time? 6 They had been throwing around that Α. 7 like C(4) thing all the time like over and 8 over again, and then Gregg said -- like because Gregg and I had a conversation about 9 him coming back before I went to Daniel. 10 11 Matt was the one that originally like 12 brought it to me and I thought that like -and I said to Gregg like, "I don't", on the 13 phone, "I don't" -- like when we first told 14 15 Daniel what happened, I said to Gregg, I 16 said, "I just told Daniel everything, and 17 you'll never do this to me again". And then the second time that we 18 talked he apologized, and then he was like --19 20 you know, I thought that like if he learned 21 his lesson and he wouldn't be like that 22 towards us and we could all be on equal 23 footing that maybe it would help Daniel and it would help The Middle East Forum, so I 24

Page 397 1 asked Daniel to bring him back. 2 So, backing up, you said that when Ο. 3 Daniel made this decision you had a 4 conversation with Gregg about it? 5 I did, Matt and Gregg. Α. 6 Ο. Okay. 7 Α. Matt facilitated the conversation. 8 And you told Gregg --Q. 9 Α. That I was going to go to ask Daniel to bring him back. 10 11 No, no, no, back up, back up. When Ο. 12 you had a conversation with Gregg, you told 13 him, "I told Daniel everything that happened, 14 and you're never going to do this to me 15 again"? 16 I did. I said that to him -- the day 17 that Marnie went to Daniel and we had that 18 in-person conversation, Gregg was calling me. 19 He was out of the office that day, and he was 20 calling me on my phone. And he called and he 21 was like, had this like nasty tone in his 22 voice, and I -- that's when I said it to him 23 on the phone. 24 Okay. Q.

```
Page 398
 1
             I said, "Gregg, I don't want to, I
 2
     don't want to talk to you". I said, "I just
 3
     told Daniel everything that you've ever done,
 4
     and you're never going to do this to me or
 5
     another human being".
 6
             Okay. Was that the first time that
       Ο.
 7
     you ever told Gregg that he was never going
 8
     to do this to you or another human being
     again?
 9
       Α.
             I believe so.
10
11
             Okay. It was also the first time you
       0.
12
     ever talked to anybody above Gregg at The
13
     Middle East Forum about these issues?
14
       Α.
             No.
15
                   MR. CARSON: Objection.
            Assuming facts not in evidence.
16
17
                   THE WITNESS: I already
18
            testified that I told you right away
            I told, I told -- oh, above him?
19
20
     BY MR. CAVALIER:
21
       Q.
             Yes.
       Α.
22
             Well, there is no really above Gregg.
23
       Q.
             All right, let me rephrase it. It's
     also the first time you ever had conversation
24
```

Page 399 1 with Daniel Pipes about any of Gregg's 2 behavior that you objected to? 3 Α. Correct. I mean it was because that 4 we were at like our wits' end. It was the 5 last straw. Gregg -- the office had become 6 so chaotic and so hard to work for and that 7 we were scared and I wanted to protect my job 8 and I wanted to protect The Middle East Forum, so that's why we went to Daniel. 9 10 Ο. Sure. So the very -- so, for the 11 very first time, you told Gregg "you're not 12 going to do this to me or any other person", 13 and --14 Because I felt like, I felt at the Α. time when I told Daniel everything that he 15 16 would protect us, --17 Q. Okay. -- and he didn't. 18 19 Ο. And your response -- and Gregg's 20 response to hearing that was to apologize to 21 you, correct? 22 Α. No. He didn't apologize to me until 23 Matt Bennett was on the phone until we were talking about bringing him back. 24

		Page 400
1	Q. Okay. So that occurred later?	
2	A. Uh-huh.	
3	Q. Okay. Did his apology mean anything	
4	to you?	
5	A. I don't really trust Gregg. It's	
6	like, you know, sometimes it's like keep your	
7	friends close, your enemies closer. Like I	
8	didn't trust him, but I felt like The Middle	
9	East Forum kind of needed him.	
LO	Gregg is very brilliant. Like I'm	
L1	not going to say that Gregg's not smart.	
L2	He's a very, very, very smart man. He knows	
L3	his stuff. He's, you know, like and he	
L4	does good work. That's not his problem.	
L5	Q. Did you ever tell anybody that you	
L6	had a Gregg plan in reference to getting	
L7	Gregg out of the office?	
L8	A. It was actually to bring Gregg back	
L9	to the office. That was my Gregg plan.	
20	MR. CARSON: Objection.	
21	BY MR. CAVALIER:	
22	Q. Well, I'll get to that question, but	
23	my first question to you is: Did you ever	
24	tell anybody that you had a Gregg plan to get	

```
Page 401
1
     Gregg out of the office?
2
                   MR. CARSON: Objection.
3
                   THE WITNESS: I don't know. I
4
            mean like I definitely was telling,
5
            like talking to people about how we,
6
            me and Marnie and Tricia were going
7
            to go and tell the truth to Daniel.
8
            That's a plan.
                   Like, "We have a plan to tell
9
            Daniel. We're going to write it
10
11
            down. We're not going to send it
12
            over e-mail. Like we're letting him
13
            know what happened".
14
     BY MR. CAVALIER:
15
       Q.
             Okay.
16
             "He's terrible, and he needs to go".
17
     And we thought that he would get fired. We
18
     were hoping that he would get fired.
19
             So that's the plan, get Gregg fired
20
     because he's a freakin' sexual harassing,
21
     tormenting tyrant.
22
       Q.
             And yet several months later, you're
     advocating to bring him back, correct?
23
             The office was in disarray, and I
24
       Α.
```

```
Page 402
1
     thought that -- and I thought that -- I find
2
     the good in people. I thought that he would
3
     be redeemable, but he's not.
4
             I thought that six months out of the
5
     office, you know, a thing that you're
6
     passionate about, you'd say, "All right.
7
     Wake up call. I did wrong here. I'm going
8
     to say I'm sorry", which he did say I'm
     sorry, "and I'll do better", which he said,
9
     and he didn't do it.
10
             I talked to him first before I went
11
12
     to Daniel so that I could make sure that he
13
     would say he was sorry and that he wasn't
     going to do it again, which he did, and he
14
15
     didn't. I would have never gone to Daniel
16
     asking him that had Gregg not said those
17
     things.
18
       0.
             Okay. So I want the record to be
19
     clear, so I want to ask the question again.
20
     Why, in your own words, did you ask Daniel to
21
     bring Gregg back?
22
       Α.
             Because --
23
                   MR. CARSON: Objection.
                                            Asked
24
            and answered. You can answer.
```

		Page	403
1	THE WITNESS: Because Daniel		
2	seemed to be floundering without an		
3	administrator. Daniel is not an		
4	administrator. He was also taking		
5	advice from Gregg Roman anyway. We		
6	would hear it downwind third-way, and		
7	I would hear it like through Gregg		
8	through Daniel, like it would come		
9	back. Like things that would happen		
LO	and advice would come back and it		
L1	would circulate, and you could tell.		
L2	And then I asked Daniel, what I		
L3	said, "A lot of people in the office,		
L 4	they're like feeling some type of		
L5	way", and he said and he told me,		
L6	he's like, "Well, I still take		
L7	counsel from Gregg Roman", and he		
L8	did. And he said he values Gregg's		
L9	opinion very much. So oh, that's		
20	my neighbor. So he said he valued		
21	his opinion, and he was already		
22	listening to him.		
23	So, if Gregg could learn his		
24	lesson and be a human and, you know,		

		Page 404
1	treat us with respect, then maybe we	
2	could all do the good work of The	
3	Middle East Forum.	
4	And my goal was to have a	
5	stable work environment where, you	
6	know, Gregg would be normal. I was	
7	hoping that that would happen.	
8	Because Gregg is smart. He's	
9	brilliant.	
10	MR. CAVALIER: All right.	
11	Thank you. Seth, I'm going to, I'm	
12	going to tender it to Sid for some	
13	questions. I may have a couple more	
14	questions for you shortly, but	
15	THE WITNESS: That's fine.	
16	MR. CAVALIER: for now, I'm	
17	going to, I'm going to tender you to	
18	my colleague Sid Gold.	
19	MR. CARSON: I think you, I	
20	think you should finish all your	
21	questions before turning it over to	
22	Mr. Gold.	
23	MR. CAVALIER: I mean I	
24	appreciate your thoughts on that, but	

		Page 405
1	I disagree.	
2	MR. CARSON: Yes. I mean we're	
3	not going to go back and forth. This	
4	isn't a tag-team match.	
5	So, if you're resting, then the	
6	next person who's going to ask	
7	questions after Mr. Gold is me, and	
8	if you want to ask more questions,	
9	you'll have to do it on cross.	
10	So, with that understanding,	
11	you're done, but let us	
12	MR. CAVALIER: We do not, we do	
13	not have an understanding on that	
14	point, but it may not be an issue, so	
15	we'll see.	
16		
17	EXAMINATION	
18		
19	BY MR. GOLD:	
20	Q. Ms. Barbounis, my name is Sid Gold.	
21	I think we've met once or twice perhaps.	
22	A. I think once.	
23	Q. I just want to kind of get my	
24	bearings straight here. I know it's been a	

		Page 406
1	long day for you and a long day for	
2	everybody. Are you okay to do you need a	
3	break or something or are you okay to keep	
4	going?	
5	A. I would like to get this over as soon	
6	as possible.	
7	Q. Okay. When did you resign from The	
8	Middle East Forum, roughly speaking, the	
9	date?	
LO	A. August, I want to say before the	
L1	19th. Because I started on the 19th. So	
L2	August, I don't know.	
L3	Q. August of 2019?	
L 4	A. Something like that.	
L5	Q. Okay. And when did you start sending	
L6	out appli-, I guess your resume out or trying	
L7	to find a new position of employment? Do you	
L8	recall when that started?	
L9	A. I had put like a couple out here and	
20	there. I had such a hard time getting a	
21	political job in Philly when I took The	
22	Middle East Forum job that I remember how	
23	painful and laborious it is.	
24	So I threw a couple out like around	

		Page	407
1	like the Ezra time, and I had like feelers		
2	out there. I had asked EJ if he heard, like		
3	if he hears of anything let me know. I had		
4	been putting feelers out after I think I put		
5	like a resume or two out there, but I really		
6	started to apply heavy in the end of June.		
7	Q. Okay. When you met with Dr. Ziv back		
8	in it looks like August of 20, I'm sorry,		
9	September 22, 2020, I think you had told her		
LO	that in May or June of 2019 you began looking		
L1	for employment outside MEF and you had		
L2	applied for approximately 55 local jobs here		
L3	in the Philadelphia area. Is that about		
L4	right? I'm just trying to get a time frame		
L5	here.		
L6	A. I don't know about I don't even		
L7	remember saying that to her at all actually,		
L8	but		
L9	Q. Would that be		
20	A. Excuse me, I'm finishing answering		
21	your question. I was applying for jobs then		
22	too. Like I told you, I put feelers out and		
23	things like that. And I did, like I said,		
24	heavy, submit resumes heavy in June, and all		

Page 408 1 sum total would probably be about 50. 2 Okay. And I'm not trying to lock you Ο. 3 into a number or a precise date. I'm just 4 trying to get an approximate time frame here, 5 that's all. 6 Α. Yes, I mean like even when we were 7 doing the Ezra thing I was, that's when I was 8 putting out feelers there. I was asking Grayson if he knew anything. 9 10 That -- when was that? The Ezra 11 thing was in like a year before that, right. 12 That was like in like the December/January 13 area. 14 December 2018, January 2019? Q. 15 Yes. I mean, even then, like I was Α. 16 like putting feelers out and stuff, but like 17 May/June really hard. June was like when I 18 was really like, "I got to get out of here". 19 Now, before you came to work at The 0. 20 Middle East Forum, you had worked with a 21 congressman? 22 Α. Yes, two. 23 Q. Who was that? 24 Congressman Ryan Costello. Α.

			Page	409
1	Q.	And was that in D.C. or was that		
2	local?			
3	A.	West Chester and sometimes D.C. I		
4	would g	o back and forth sometimes.		
5	Q.	And how long did you work for		
6	Congres	sman is it Weber?		
7	A.	Weber?		
8	Q.	Yes.		
9	A.	I started on August 19, 2019.		
10	Q.	Okay. And who was the congressman		
11	that yo	u had previously worked for?		
12	A.	Congressman Costello and Congressman		
13	Gerlach			
14	Q.	Okay. And how long had you worked		
15	for tho	se two congressmen?		
16	A.	Five years, four years, something		
17	like th	at.		
18	Q.	And why did you leave that position?		
19	A.	Congressman Costello decided not to		
20	run for	reelection. The seat was going to go		
21	to a De	mocrat, Chrissy Houlahan.		
22	Q.	Okay. And where were they, where		
23	were th	ey, what was their geographical		
24	locatio	n in terms of who they represented?		

Page 410 1 PA 6th at the time, but we've since Α. 2 been gerrymandered. 3 Ο. Okay. Have you always been involved 4 in politics or interested in politics? 5 For a long time. Α. 6 Okay. So, at some point in time Ο. 7 though, you secured a position with 8 Congressman Weber, and how did that come 9 about? I had, like I told you, I had put 10 Α. 11 feelers out to a lot of people, and my old 12 intern from Congressman Costello's office 13 said, "Hey, there's a position open in Randy 14 Weber's office. They haven't filled it in a 15 while". And I submitted my resume to my old 16 intern, and she submitted my resume after 17 that to Congressman Weber's office. 18 And at some point in time, you became Ο. the Director of Communications for 19 20 Congressman Weber? 21 Uh-huh. Α. 22 Q. Was that a promotion of sorts? When 23 you became the Director of Communications, 24 was that -- were you a -- was that your

		Page 411
1	position when you were hired?	
2	A. Yes. That was my position when I was	
3	hired for	
4	Q. Okay. Okay. So you came in as a	
5	Director of Communications, and what is your	
6	salary in that position?	
7	A. \$80,000.	
8	Q. 80,000? And what was your salary at	
9	Middle East Forum?	
LO	A. 68, I believe.	
L1	Q. 68?	
L2	A. Uh-huh.	
L3	Q. And if my memory serves me correct, I	
L4	think you did get some bonuses at The Middle	
L5	East Forum. Do you recall that?	
L6	A. I got a 2 percent cost of living	
L7	adjustment, and then everybody got a	
8.	six-month addition to their check I think	
L9	that Caitriona and Delaney got 500, and me	
20	and Tricia got a thousand or something like	
21	that to offset, it was not a bonus, it was	
22	to offset the extra work that we were doing.	
23	Because we were down two directors, including	
24	Matt Bennett and Gregg Roman, and we were all	

		Page 412
1	taking on an extra workload. So it was a	
2	six-month, supposed to be a six-month	
3	reprieve to help us for the extra workload	
4	that we were taking on.	
5	Q. Okay.	
6	A. So it wasn't a bonus.	
7	Q. According to my records, you got	
8	\$1,000, then you were later given a check for	
9	\$6,000. Does that refresh your memory?	
10	A. I never got a \$6,000 check from The	
11	Middle East Forum.	
12	Q. Okay.	
13	A. That is incorrect.	
14	Q. So, when you applied for this	
15	position with Congressman Weber, do you	
16	recall filling out an employment application?	
17	A. We did not.	
18	Q. Did not?	
19	A. Nope. We're not required to. Our	
20	office did not do that. We don't fill out	
21	application.	
22	Q. So there's no application? You never	
23	signed an application in July?	
24	A. Nope.	

Page 413 1 Subsequent to your being hired, did Ο. 2 you fill out an application? 3 Α. They didn't fill out an application. 4 I just filled out the onboarding forms. 5 Okay. Did you ever represent, either 6 at the time you were hired or shortly after 7 you were hired, making this statement, "Since 8 entering upon my role as Director of Communications for The Middle East Forum, I 9 have increased our social media engagement by 10 11 32 percent"? 12 I had -- that is true. Because 13 that's an accurate statement. 14 And how did you -- how were you able Ο. 15 to quantify that with that precise 16 percentage? 17 At the time, I had written down when I started being the Director of 18 19 Communications and tweeting, and we got tons 20 of compliments on there that our Twitter 21 engagement was up and social media in 22 general. I wrote down the number when I started and then I wrote down the number when 23 24 I left, the percentage.

Page 414 1 And do you recall what the number was 2 when you started? 3 Α. I don't remember. I don't even 4 remember, I don't even know what it is now. 5 But I just increased my, our social media 6 engagement and our subscriber list at Randy 7 Weber's office by 52 percent this year. 8 So --9 Ο. I appreciate that. But do you have any of the documentation that you used to 10 11 make that calculation that you had increased 12 the social media engagement by 32 percent? 13 No. Middle East Forum has all that. 14 Okay. So you also put down that from Ο. 15 June of 2018 through June of 2019 you helped 16 place 1,128 articles --17 That's correct. 18 -- by 56 experts and 97 outlets. Is Q. that accurate? 19 20 Yes. Sure is. And I'll tell you Α. 21 Because -- are you going to get there? how. 22 Q. Yes. It says here from D.C.'s influential to TheHill to The Wall Street 23 Journal to The Washington Times. You put 24

```
Page 415
1
     articles in those newspapers?
2
             I helped Delaney and I facilitated
3
     that and I oversaw all of her, all of her
4
     communications. I would help her rewrite her
5
     e-mails when she was placing them. I helped
6
     track them, and they were all trackable on
7
     monday.com.
8
             So you say you helped her as opposed
       Q.
     to actually placing them yourself?
9
             That's why, that's why in my cover
10
       Α.
11
     letter that you're reading it says
12
     "assistant".
13
             It says, "I helped".
       Ο.
14
             Okay. That's helping, isn't it?
       Α.
15
             And how did you help?
       Ο.
16
             I just told you.
       Α.
17
       Q.
             How?
             I rewrote her e-mails. I would tell
18
       Α.
19
     her how to reach out to people. I coached
20
     her in all aspects of communication including
21
     even formulating e-mails to her bosses,
22
     including Gregg Roman and Daniel Pipes. I
23
     helped her write every e-mail she ever wrote.
             I'm not suggesting you didn't do it.
24
       Q.
```

		Page 416
1	I'm just trying to confirm that's what you	
2	did say. Okay?	
3	A. Or that you alleged in a Complaint	
4	against me that I lied on that. So let's	
5	not,	
6	Q. I didn't sign, I didn't sign a	
7	Complaint against you.	
8	A. Somebody.	
9	Q. You filed a Complaint. Okay?	
10	The answers were filed to	
11	Interrogatories. I'm not a party to this	
12	case. All right? I'm asking you a question.	
13	A. What	
14	Q. I'm not going to engage in an	
15	argument with you here today. I'm asking you	
16	a question. Give me the answer, and don't	
17	tell me a story or give a speech. Okay?	
18	A. Sure.	
19	Q. We'll get out of here a lot quicker.	
20	All right?	
21	MR. GOLD: Go ahead, Seth, put	
22	your objection on the record. Go	
23	ahead. And no speaking objections	
24	from you either because you wasted a	

```
Page 417
1
            lot of time here today with your
2
            speaking objections.
3
                   MR. CARSON: So, when you're
4
            done, I'll --
5
                   MR. GOLD: I'm done.
6
                   MR. CARSON: Are we ready for
7
            me now?
8
                   MR. GOLD: I'm done. Go ahead.
9
                   MR. CARSON: Lisa, you can
10
            answer the question however you
11
            understand them, but just answer his
12
            questions. Okay?
13
                   THE WITNESS:
                                 Sure.
14
     BY MR. GOLD:
15
             You also represented that you
       Ο.
16
     arranged for 27 of our experts to be
17
     interviewed 92 times by 81 media outlets on
18
     both radio and television, arranges from
19
     outlets from 124 News to Algesia and Fox
20
            Did you put that on your --
     News.
21
             I did assist in getting them done.
                                                  Ι
22
     actually, I actually helped with I24. I
23
     would get, I was getting EJ Kimball and tons
     of people spots on all of those stations.
24
```

		Page 418
1	Correct, that is correct, I did do those	
2	things.	
3	Q. And do you have a list of the 27	
4	experts that you did place?	
5	A. It's all in The Middle East Forum's	
6	stuff. You have all of it.	
7	Q. You can't recount the 27 experts	
8	right now, can you?	
9	A. I can probably name some of them.	
LO	Q. Okay. Why don't	
L1	A. There was the guy that, there was the	
L2	guy in Serbia; I can never pronounce his	
L3	name. There was a bunch of them. There was	
L 4	Benjamin Baird. There was EJ. There was	
L5	like a bunch of them. Grayson even did one	
L6	for me. There are like a ton.	
L7	Q. We have 1 so far. You got 96 more to	
L8	go.	
L9	A. I just gave you 4.	
20	Q. Okay. You got 92 more to go.	
21	A. Okay. Well, I can't remember them	
22	all off the top of my head. I'm sorry. It's	
23	been years.	
24	Q. I know	

```
Page 419
1
             They all have eccentric names.
       Α.
2
             Okay. Like what?
       Ο.
3
             I can't remember the one guy from
       Α.
4
     wherever he was -- like Iwon Ultimimi, like
5
     his name, like I can't, they're not -- I
6
    don't know them.
7
             I have a report that your lawyer
       Ο.
8
     submitted to us the other day from a Dr.,
     it's a Dr. Barry Zakirek (sic). Do you
9
     recall meeting with Dr. Zakirek (sic) in his
10
     offices at 21st and Pine?
11
12
      Α.
             No.
13
                   MR. CARSON: Zakireh.
14
                   MR. GOLD: I'm sorry. Zakireh.
15
     BY MR. GOLD:
16
             And maybe it wasn't in his office.
17
     You probably did it by Zoom. I'm sorry.
18
             Oh, his -- yes. Okay, yes.
       Α.
19
             And Dr. Zakireh was given certain
20
     medical records that were I guess furnished
21
     to him by Mr. Carson, and some of those
     records were counseling records of I believe
22
23
     a counsel you were seeing I guess it's in
24
     Washington, D.C.
```

			Page	420
1	Α.	Yes.		
2	Q.	Do you recall that?		
3	Α.	Yes, I've seen a couple.		
4	Q.	So and based on those records and		
5	based or	n your interviews with him, he		
6	submitte	ed a report. Did you have an		
7	opportu	nity to read that report at all?		
8	Α.	I did not.		
9	Q.	There's a couple things in there I		
LO	just wa	nt to cover with you, and I'm going to		
L1	ask you	whether you made these statements to		
L2	the doc	tor. Okay?		
L3		According to the doctor, you		
L4	indicate	ed that you had sought treatment for		
L5	your ps	ychological symptoms since		
L6	October	2018 when you began receiving		
L7	psychia	tric services and individual		
L8	counsel	ing at the Mindoula Health in Silver		
L9	Springs	, Maryland. Is that am I		
20	pronoun	cing that correctly?		
21	Α.	I think it's "Mindoula", and that's		
22	semi-co	rrect of a statement.		
23	Q.	Okay. I'm reading the report. So		
24	how is	it incorrect?		

Page 421 1 Well, I mean I -- so I have had, I 2 was seeing like a med management person in 3 Pennsylvania. And when I moved to D.C., my 4 regular doctor, like I got a regular doctor, 5 and he wasn't -- he wanted me to see a 6 counselor like for med management for my 7 Adderall prescriptions before he would do 8 that. And during those conversations about 9 my med management, we would talk about like my life and then they suggested that I go 10 11 into further therapy, and I saw like that 12 person, this other therapist, the Mindoula 13 people. 14 So it wasn't like it was originally 15 for med management that I went to them 16 because it was -- I actually tried when I got 17 here to get a therapist. Even in Philly, it 18 was difficult to do on my own. But that 19 doctor, my regular doctor, Dr. Oshalim helped 20 me with that. 21 Are you now in Arlington, Virginia, 22 or are you in Philly area? Where are you situated right this minute for this 23 deposition? 24

Page 422 1 Right now, I'm in Arlington. Α. 2 Okay, good. That's what I thought. Ο. 3 Okay. Now, I also noticed that from 4 looking at the records at some point in time 5 the drug Adderall is prescribed to you and 6 you've been taking that for a while for your 7 ADHD? 8 I've been taking that since 2008, Α. 9 correct. And I see that at certain times the 10 Ο. 11 drug Zoloft was prescribed to you as well? 12 Α. Correct. I also noticed that, in the medical 13 records, that the drug Dexedrine, which I 14 15 guess goes by the name Dextroamphetamine, was 16 also prescribed to you. Do you recall taking 17 that medication? 18 Isn't that Adderall? Α. 19 No, it's not Adderall. It's Ο. 20 Dextroamphetamine. There was a time when you 21 were given like -- you would take three times 22 a day you were taking 10 milligrams, and then 23 at other points in time you were taking 10 24 milligrams three times a day and

```
Page 423
1
     20 milligrams three times a day. Do you
2
     recall that at all?
3
      Α.
             If it -- I don't know.
4
                   MR. CARSON: I think that your
5
6
                   THE WITNESS: I don't know what
7
            that is.
8
                   Wait. How many times a day was
9
            I taking it? Three times a day is my
            Adderall prescription, 10 milligrams
10
11
            a day three times a day.
12
     BY MR. GOLD:
13
             You were taking both Adderall and a
14
     drug called Dextroamphetamine. Do you recall
15
     that at all?
16
      A.
            No.
17
         Are you still taking
     Dextroamphetamine?
18
19
       Α.
             I'm only taking -- I thought
20
     Dextroamphetamine -- I'm only taking
21
     Adderall. Like that's it. Nothing else.
22
      Q.
             Okay. Well, --
23
       Α.
             I can go look at my pill bottle.
             All right, yes. I don't want you
24
       Q.
```

```
Page 424
 1
     checking right now, but during the last
 2
     couple years, --
 3
       Α.
             Adderall -- I think that's the
 4
     generic form of Adderall, if I'm not
 5
     mistaken.
 6
       O.
             It's not, okay. It's not. They're
 7
     two separate drugs. Okay? I'm asking --
 8
       Α.
             Well, I've only been, ever been
     prescribed Adderall.
 9
             Okay. So you don't recall any
10
       Ο.
11
     psychologist or psychiatrist prescribing the
12
     drug Dextroamphetamine?
13
       Α.
             No.
14
             Okay. And if you were, I guess you
       Q.
15
     would -- have you ever tried to research what
16
     the adverse impacts are of taking Adderall?
17
             I've never had any adverse effects
     I'm on such a low dose.
18
19
             What's your low dose?
       Q.
20
             I've been taking it for years.
       Α.
21
             30 milligrams a day.
22
       Q.
             What pharmacy do you get these
     prescriptions filled at in -- where is your
23
     pharmacy located in?
24
```

```
Page 425
 1
             Usually, it's Dupont Circle Pharmacy.
       Α.
 2
             Where is that located at?
       Ο.
 3
       Α.
             In Washington, D.C.
 4
             Is that where you've been getting
       Ο.
 5
     your prescriptions filled since you've been
 6
     in D.C., I take it?
 7
             Yes, sir.
       Α.
 8
             Now, you also told me Dr. -- hold on,
       Q.
 9
     I'll get his name.
                   MR. GOLD: Zakireh, is that his
10
11
            name, Seth?
12
                   MR. CARSON: Yes, that's it.
13
     BY MR. GOLD:
14
             You told Dr. Zakireh that you were
       Ο.
     having adjustment difficulties going back to
15
16
     when you were in, I guess in 12th grade and
17
     due to strains in your relationship with your
     parents. Do you recall that you stated that
18
19
     you had stated -- you had stated that you
20
     attended several family therapy sessions when
21
     you were younger. Is that accurate?
22
       Α.
             Yes, a few, but my mom refused to go.
23
             Is that with a psychiatrist or
       Q.
24
     psychologist?
```

Page 426 1 It was a friend's, a friend of the 2 family who was one of them. I don't know 3 what he was. 4 Do you recall what you were being --Ο. 5 Might be a psychiatrist. Α. 6 Do you recall what you were being Ο. 7 treated for back then? 8 Α. It was just kid stuff. 9 Ο. It also says here that you were enrolled in six-month group therapy program 10 11 at the Dialectical Behavior Therapy in 2011. 12 Do you recall that? 13 Uh-huh. Α. 14 What was that all about? Ο. 15 I had like, I was having like some Α. 16 issues with, just in general like emotion 17 regulation when it came to my parents and when it came to like Vasili and some of my 18 19 deep, like personal relationships. It never 20 affected like school or work. 21 It was always like anybody that was 22 like super close to me I would get very upset with them. Like my mom, I would always think 23 that she was like criticizing me or whatever, 24

```
Page 427
 1
     I don't know. But it was that, it was
 2
     emotion regulation.
 3
             You were actually a student at Penn
       Ο.
 4
     at that point?
 5
             Uh-huh.
       Α.
 6
                   THE COURT REPORTER: Yes?
 7
     BY MR. GOLD:
 8
       Q.
             You mentioned Vasili.
 9
                   MR. CARSON: Yes?
     BY MR. GOLD:
10
11
             Did you know Vasili in 2011?
       Ο.
12
       Α.
             Yes. I've known -- I started dating
13
     Vasili in 2006.
14
             Okay. I didn't know that.
       Q.
15
             Yes, they said that was a voluntary
     program to enhance coping and problem-solving
16
17
     skills.
18
       Α.
             Uh-huh.
19
             And you benefitted from the program,
       Ο.
20
     according to this report?
21
       Α.
             Immensely.
22
       Q.
             Then it says that you were
     hospitalized with an acute, in an acute
23
     psychiatric facility for 72 hours --
24
```

Page 428 1 That was an accident. Α. 2 -- in 2004 when you were 21. What Ο. 3 was that about? 4 Α. I had a fight with a boyfriend. 5 had a fight with a boyfriend. We came back 6 from the Eagles game. It was on the phone. 7 I was drinking. I was 21. Probably couldn't 8 handle my liquor right. I sma- -- was 9 yelling at him and he was screaming at me, and I was in the bathroom and I just like 10 11 smashed, like I hit a mirror like with my 12 hand here. And so I got a cut here, like up here, up here and I was bleeding, and I 13 14 passed out. I fell asleep. 15 And so my girlfriend Summer comes over and she sees me sitting there bleeding 16 17 and whatever and she calls freakin' 9-1-1, so I went. And I was like yelling at the 18 19 doctor, because I was drunk, that I didn't 20 need to be there, that it was all a mistake. 21 I was trying to like clean my hand off to 22 show I didn't try to slit my wrist, because I didn't. 23 And the doctor, like the psychiatrist 24

		Page 429
1	that like came to evaluate me, he said I had	
2	a bad attitude and he was going to teach me a	
3	lesson, so they went over there. So they	
4	took me off and they said, "Sign yourself	
5	in", and I said "okay" and I did. And then	
6	the doctor is like, "Why are you here", and I	
7	was like," I would love to know". And so we	
8	talked about it and they thought it was	
9	ridiculous, and I got released.	
10	Q. Was that a voluntary commitment?	
11	A. Yes.	
12	Q. Was that a, was that at a psychiatric	
13	facility or a hospital, do you recall?	
14	A. Actually, I tried to find the records	
15	for it to like whatever, and I can't even	
16	remember I tried because I was interested	
17	in getting a permit to carry and I didn't	
18	know if like that qualified or whatever.	
19	And I couldn't even find the	
20	location. I thought it was Friends. I	
21	called there. It wasn't there. I don't even	
22	know where the facility was. They just drove	
23	me off there. That was so long ago. That	
24	was like when I was 21, 21.	

			Page	430	
1	Q.	Yes.			
2	Α.	That was like forever ago. I tried			
3	to find	those records, and I can't. I can't			
4	even te	ll you where it was.			
5	Q.	Was that a you say you punched a			
6	mirror.	Was that actually at the Vet or was			
7	this actually at another location?				
8	Α.	It was in my apartment.			
9	Q.	Your apartment, okay.			
LO	Α.	I was fighting, crying with my			
1	boyfriend, yes.				
L2	Q.	Okay. Do you recall that you were			
L3	diagnosed with any type of				
L4	Α.	He wasn't there. He was driving to			
L5	the shore.				
L6	Q.	Do you recall that you were diagnosed			
L7	with any type of a psychological				
L8	Α.	I was not.			
L9	Q.	at that point? No.			
20		Were you taking any medication beyond			
21	the Add	erall at that point?			
22	Α.	No. I wasn't even taking medication			
23	at that	point. That was so that was way			
24	before 1	medication or I ever saw anybody.			

Page 431 1 Like that was way before all that. 2 Do you know whether they did a psych Ο. 3 workup on you at the time? 4 Α. I don't know. I don't really, I 5 don't really remember a lot of that like. Ιt 6 was like a blur. 7 O. Your records --8 I didn't start seeing any therapists until 2008 I think it was when I went to 9 10 Penn. 11 And who do you see there? Ο. 12 I saw Dr. Zwil. And there was 13 another lady, I don't remember her name, it 14 was like so long ago, and I did the CBT 15 program. 16 That all started because I was in 17 class and I was like, you know, messy desk, 18 not paying attention, and one of the, one of 19 the professors was like, "Yo, have you ever 20 been checked out for Adderall? Like maybe 21 you have ADHD". And I got checked out. I went to 22 like a psychia-, a sociologist, something. 23 Ι did like a multiple series of events with 24

		Page 432
1	her. She diagnosed me with ADHD. And then 1	<u>.</u>
2	went to Penn for med management, did a little	2
3	therapy. It was awesome.	
4	Q. That's great. Now, you told the	
5	doctor when you met with him that you denied	
6	any history of substance abuse, correct?	
7	A. Correct.	
8	Q. And you acknowledged that occasional	
9	excessive consumption of alcohol, especially	
LO	when you were in your late teens or early	
L1	adulthood. Is that somewhat accurate?	
L2	A. That's accurate.	
L3	Q. And that indicated that when under	
L 4	stress, over the last two years, you consumed	l
L5	alcohol two to three times per week though	
L6	generally in moderate amounts?	
L7	A. Correct.	
L8	Q. Have you ever been treated for	
L9	alcoholism or anything of that sort?	
20	A. No.	
21	Q. Do you consider yourself to have an	
22	alcohol problem?	
23	A. Absolutely not.	
24	Q. You told the doctor that the alcohol	

		Page	433
1	consumption helps you cope with your anxiety		
2	or other negative effects in your adaptive		
3	manner. Do you recall telling him that?		
4	A. I don't remember telling him that,		
5	but there's times where I'm stressed out and		
6	I'll have a beer or a glass of wine.		
7	Everybody does.		
8	Q. Have you ever gone on any type of		
9	binge drinking for a while when things were		
10	really not going well for you?		
11	A. No.		
12	Q. Now, you also told the doctor that		
13	you had a strained relationship with your		
14	mother, which I think you've alluded to here		
15	earlier today, and		
16	A. When I was younger.		
17	Q. Yes.		
18	A. We're very close now.		
19	Q. Yes, during your childhood or		
20	adolescence which you perceived as critical.		
21	You indicated that your parents loved		
22	you and took care of you but they were not		
23	overly affectionate, rendering her hungry and		
24	longing for such displays of closer emotional		

			Page	434
1	ties.	What did you mean by that?		
2	Α.	I mean they're his words. I don't		
3	know.	Like my parents were, they didn't know		
4	what AD	HD was. They thought that I was lazy		
5	or that	I was messy, and I got in trouble all		
6	the time	e.		
7	Q.	But you also reported that your		
8	relation	nship with your parents have improved		
9	in adul	thood, correct?		
LO	Α.	Yes.		
1	Q.	You seem to have a close relationship		
L2	with yo	ur mother versus your dad. Any reason		
L3	for tha	t or		
L4	Α.	Oh, no, I love my dad. Me and my dad		
L5	are thi	ck as thieves. I love my dad.		
L6	Q.	Your dad		
L7	Α.	My dad me and my dad actually,		
L8	more pe	ople would classify me and my dad as		
L9	tighter	than me and my mom. I mean I tell my		
20	mom eve	rything, but me and my dad are like		
21	best fr	iends.		
22	Q.	How old is your dad now?		
23	Α.	He is, God, 70.		
24	Q.	I can identify with that.		

		Page	435
1	You described your father as a		
2	functional alcoholic		
3	A. He is.		
4	Q during your interview with the		
5	doctor. What did you mean by that?		
6	A. My dad alcoholism runs in my		
7	family on both sides. My dad comes home from		
8	work every day and has, you know, three or		
9	four beers, five beers. And like I've never		
10	seen my dad like drunk or anything like that,		
11	like or obnoxious or anything like that, but		
12	like he definitely drinks every day.		
13	Q. Okay. I think you said your maternal		
14	grandfather as well as your maternal uncles		
15	are, were binge drinkers.		
16	A. Binge drinkers, yes.		
17	Q. What exactly is a "binge drinker"?		
18	A. So my uncle or my grandfather were		
19	the same way. They'll go weeks without		
20	drinking or maybe not even weeks. My		
21	grandfather was a little more than that. But		
22	he would have periods of sobriety, and then		
23	he would have periods of alcoholism where		
24	like he'd fall down like drunk, like getting		

			Page	436
1	DUIs, yo	ou know, slurring his words, not		
2	knowing	his name, like you know what I mean,		
3	like dr	unk, like drunk. Like not like my		
4	dad, I'	ve never seen my dad like that. My		
5	grandfat	ther and my uncle I have.		
6	Q.	I forgot to ask, do you have any		
7	siblings	s?		
8	Α.	My brother.		
9	Q.	How old is your brother?		
10	Α.	36, 37.		
11	Q.	Are you close with him?		
12	Α.	Very.		
13	Q.	Is he local or out in		
14	Α.	He's in Philly.		
15	Q.	Philly, okay.		
16	Α.	He does not have any problem with		
17	alcohol	and doesn't use any drugs.		
18	Q.	I'm happy about that.		
19		Now, you have two children. You have		
20	a six-ye	ear old daughter and a four-year old		
21	son?			
22	Α.	That's correct.		
23	Q.	And this is your very you only		
24	have bee	en married one time, correct?		

Page 437 1 Α. Correct. 2 You stated to your, you told the Ο. 3 doctor during the consultation that you've 4 experienced mental difficulties in the last 5 several years and part due to the work 6 stressors associated with the instant case as 7 well as financial difficulties on the part of 8 her husband. 9 Α. That's true. Tell me about the financial 10 Ο. 11 difficulties that you're having. 12 Α. So -- my husband, especially I love 13 when he tries hard, when we got married, 14 apparently he got audited for years prior, I 15 think they were 2006, seven and eight or 16 something like to that, to our marriage. 17 when he got audited, he kind of like didn't 18 tell me he was trying to like do, handle it 19 on his own or he was supposed to -- Vasili is 20 not like the most disciplined, regimented 21 person, and he like didn't follow-up or 22 didn't do what he was supposed to do with 23 that. And so then he started saying, "Well, I'll just pay it", right. He was going to 24

Page 438 1 try to fight it, and then he goes, "I'll just 2 pay it". So then he was going to pay it and 3 then he wound up not paying like, not paying 4 his quarterly taxes, and then before he knew 5 it, he was like snowballed in debt from the 6 IRS. So he's like, "Okay. Well, I'm just 7 going to like get a tax attorney to file 8 this", but then he didn't. And so I didn't know any of that was 9 going on. I filed. I signed. I thought he 10 11 was paying his quarterly taxes, like his 12 estimated quarterly payments. And then come to find out in like, what, 20--, I don't know 13 when it was, we were living in Oak Road or 14 15 Catherine Street, it was like right when 16 Olivia was born, 2014, I saw a lien and I got 17 a letter from the IRS. What am I getting a letter from the IRS? They take the taxes out 18 19 of my check. And they said there's a lien against my name for a certain amount while we 20 21 were together. 22 So he explained to me his problem, and then I -- so then I kind of like helped 23 take over. So I -- because I had, like I 24

		Page 439
1	worked with taxpayer advocates, so I knew who	
2	to talk to. And I worked with tax like I	
3	worked with taxpayer advocates for	
4	constituents before. So I knew who to call,	
5	and I got them to like temporarily like stop,	
6	you know, like seizing assets or any of that.	
7	I filed for injured spouse or whatever	
8	spouse, which they denied. Apparently, it's	
9	like a very high threshold to do, even though	
LO	he admitted that I didn't know about it. I	
L1	applied for injured spouse, but either way,	
L2	we're somewhat on a plan.	
L3	I started filing, I started filing	
L4	married but separate, and you know, they're	
L5	not collecting on me. They take my return	
L6	every year. And then he is, you know, I	
L7	can't make Vasili go to work and I can't make	
L8	him write the check and I can't make him sell	
L9	more houses. So I separated myself from him	
20	financially that way so that I wouldn't be	
21	incurring any more debt from him.	
22	SPEAKER: Are you calling me?	
23	BY MR. GOLD:	
24	Q. Was there	

```
Page 440
1
       Α.
            What?
2
                   MR. GOLD: Is somebody talking
            there? I'm sorry, I thought I heard
3
4
            somebody say something.
5
                   THE WITNESS: I did too.
6
                   MR. CARSON: I did too.
7
                   MR. GOLD: I'm hearing things
8
            now.
9
                   THE WITNESS: No, you didn't
            hear it. I heard it too.
10
11
                   MR. CARSON: It sounds like
12
            "are you calling me". I don't know.
13
            Keep going.
14
                   THE WITNESS: Okay.
15
    BY MR. GOLD:
16
            So the lien, when you discovered the
17
     lien letter from the IRS, was that lien
18
     extinguished or is that lien still, you
19
     still --
20
      A. Oh, no, it still exists.
21
          Okay. Was your husband on a payment
      Q.
22
    plan?
23
      Α.
            We were. We're doing payment plans.
     We're also trying to do offer and compromise.
24
```

		Page 441
1	I mean we've been working with the IRS pretty	
2	closely which is a relief because, you know,	
3	I'm not worried about garnished wages or	
4	anything like that.	
5	Q. Okay. So has he been keeping current	
6	with that plan to the best of your knowledge?	
7	A. To the best of my ability, yes.	
8	Q. Okay. And how is he doing? He's in	
9	the real estate business I understand?	
10	A. Yes. I think that we're I mean he	
11	does well. He makes like 200-and-some	
12	thousand dollars a year usually, sometimes	
13	less. I don't know, one year he didn't make	
14	that much.	
15	But, you know, as far as he tells me,	
16	I mean I don't we have separate bank	
17	accounts. We have one joint account that we	
18	just kind of like switch like money into.	
19	Like if I need money, I'll say "put \$30 in	
20	the joint", you know, and I take it out and	
21	put it in my own account. And we've operated	
22	like that forever.	
23	So it's not like I really know the	
24	ins and outs of his things, but from what I	

		Page 442
1	understand, he's doing better. Like his mom	
2	is here to help with his kids so he can	
3	concentrate more on work and work harder and,	
4	you know, sell more houses and get us out of	
5	debt.	
6	Q. His mom lives in Florida or dad lives	
7	in Florida?	
8	A. She lives in Florida, yes. Her my	
9	father-in-law just died, so	
LO	Q. Sorry to hear that.	
L1	A she's up and helping with the kids	
L2	instead of taking care of him.	
L3	Q. Sorry to hear that. You told the	
L4	doctor that you had felt insufficient	
L5	emotional support from your husband and	
L6	perceived him as downplaying your	
L7	difficulties with your supervisors at MEF.	
L8	What did you mean by that?	
L9	A. Exactly what we said. I had said	
20	that earlier. I testified earlier to that	
21	today saying that, you know, I was having a	
22	really hard time, and he knew it.	
23	And remember even when I said, like I	
24	told him what was happening with Danny, he's	

		Page 443
1	like, "Oh, you're going through a phase	
2	because you're having a hard time at work".	
3	But he didn't, he wasn't emotionally there	
4	for me like I needed. I don't know, I just	
5	needed a, I needed somebody to pat me on my	
6	back and tell me it was going to be okay or I	
7	needed somebody to say, "You know what, it's	
8	okay if you get another job. It's okay if,	
9	you know, we have to work it out for a little	
LO	with you living in D.C." I just need a	
L1	little more support there from him.	
L2	Q. I think you said that's what he said	
L3	when you told him about the affair you had	
L4	with Mr	
L5	A. Danny Tommo. It wasn't an affair.	
L6	He knew about it, so	
L7	Q. Okay. Was he upset and you said	
L8	he wasn't as upset about that as you thought	
L9	he might be. Am I stating that accurately?	
20	A. I mean I wasn't I didn't know	
21	how I didn't expect him to have a reaction	
22	either way. I think that when he said	
23	"you're going through a phase because you're	
24	having such a hard time at work" and he knows	

		Page 444
1	what kind of person I am, I think that he	
2	understood somewhat where I was mentally, but	
3	he didn't know how to be there for me in the	
4	way that I needed him to be.	
5	Q. You told the doctor that your marital	
6	difficulties have led to decreased intimacy	
7	and sexual relationship with her husband and	
8	that you engaged in sexual relations	
9	sporadically after the birth of your son in	
LO	20	
L1	A. That's not true. I never had, I	
L2	never had touched another man, had been	
L3	interested in another man until October 23,	
L4	2018.	
L5	Q. Okay. I'm just reading what the	
L6	doctor wrote.	
L7	A. Well, he must have	
L8	Q. I'm not vouching for the accuracy of	
L9	it. If he didn't testify what you said, I	
20	don't want to hear that, so that's fine.	
21	And he said that you had so the	
22	fact the doctor wrote down that you engaged	
23	in sexual relations sporadically after the	
24	birth of your son in 2016, that's not	

Page 445

accurate?

A. No. I -- we -- after the birth of my son, our sex life decreased for sure. I mean we had two kids and we were up at night, and that was true, our sex life absolutely decreased after the birth of my son.

I mean we had two kids, babies up at night, she's doing one thing, he's doing another, you know, we're just trying to survive for the most part, but I never, I never, ever, ever had any kind of intimate relationship with another man until October 23, 2019, '18.

Q. It says here that for, according to collateral records -- and the records are, by the way, the reports of your therapist that you met with every, often times three times a week or two times a week. And according to those records, that you had engaged in extramarital sexual relations with several men or boyfriends since diminished intimacy with her husband.

Have you had several boyfriends or men that you've had extramarital

Page 446 1 relationships since I guess 2018? 2 Α. I have. 3 And your husband is aware of those? Ο. 4 I think you said you told him about them? 5 Yes. He's spoken to Ryan on the Α. 6 phone. 7 Ο. And you -- it said here that you 8 acknowledge and related that the extramarital relations diminish your self-esteem, and you 9 were seeking validation by dating multiple 10 individuals often in both a compulsive and 11 12 impulsive manner and feeling unlovable. 13 that somewhat accurate? 14 I think that -- it's kind of 15 accurate. I started to -- it wasn't the 16 affairs that were making me, that were making 17 me have a diminished self-esteem. I had a 18 diminished self-esteem and, therefore, was 19 having an affair, well, not affairs, but I 20 was having relationships with people look-, 21 seeking validation. 22 Q. Do you know what he meant when he 23 wrote you had engaged in both compulsive -- I guess he said the dating and affairs and 24

		Page 447
1	relations you had with these men were both	
2	compulsive and impulsive in terms of their	
3	manner. Do you have any recollection what	
4	you meant by that?	
5	A. I don't I didn't say that.	
6	They're not words that I use. It sounds like	
7	his interpretation of something that I might	
8	have said, but I've never used the word	
9	"compulsive".	
LO	Q. The doctor said that you told him you	
L1	felt like you were unlovable. What did you	
L2	mean by that?	
L3	A. I do sometimes feel like I'm	
L4	unlovable.	
L5	Q. Why is that?	
L6	A. Because I make, I make mistakes. I'm	
L7	not perfect.	
L8	Q. And it says that you cope with your	
L9	emotional stressors by sexually acting out in	
20	a maladaptive or self-destructive manner in a	
21	sense of addiction or narcissistic	
22	relationships. Is that accurate?	
23	A. I mean is that what he said? Jesus.	
24	Maybe that's his interpretation. If I do,	

```
Page 448
 1
     that's pretty sad.
 2
             I think it's based on some statements
       Ο.
 3
     that he read from some of your meetings with
 4
     your psychologist.
 5
             Maybe.
       Α.
 6
                   MR. CARSON: Mr. Gold, what
 7
            report are you reading from right now
 8
            just so I can keep up?
 9
                   MR. GOLD: What's that?
10
                   MR. CARSON: What report are
11
            you reading from right now just so I
12
            can keep up?
13
                   MR. GOLD: I'm reading from
14
            your expert's report.
15
                   MR. CARSON: Dr. Zakireh, okay.
16
                   THE WITNESS: I think that he
17
            was --
18
                   MR. GOLD: Yes.
19
                   THE WITNESS: And he was
20
            referring -- and he read --
21
     BY MR. GOLD:
22
             And he read it, he got it off of the
     counselor reports?
23
24
       Α.
             Correct.
```

Page 449 1 By the way, how often did you meet 2 with these, I guess are these psychologists 3 or are these counselors? What exactly were 4 they? 5 There's -- the med management people Α. 6 is a counselor. However, she's not a 7 licensed psychiatrist or a therapist. She's 8 just a counselor. And then -- that's the med 9 management people. And then she would -- I would talk to 10 11 her like once a week for like half an hour, 12 45 minutes, and then she would report that to a psychiatrist, who then would make a 13 14 determination if my meds were working or were 15 apparent or whatever. 16 Okay. Well, it looks like you met Ο. 17 with, this must be your primary care doctor. Because it looks like it's 11/20 -- these 18 19 records, by the way, were supplied by your 20 counsel. I don't -- that's how I got them. 21 That's fine. I know that. I think I Α. 22 gave permission for them to be supplied. 23 Q. So it looks like you met your primary care physician sometime in November of 2019, 24

		Page	450
1	and I guess at that point you had met at the,		
2	this is in Washington, D.C. at the offices of		
3	Maximilian.		
4	A. Maximilian Oshalim.		
5	Q. What's the name? How do you		
6	pronounce that last name?		
7	A. Oshalim.		
8	Q. Oshalim, okay. I butcher these names		
9	up. And that was at 2075 L Street Northwest,		
10	Washington, D.C. So definitely you were		
11	working for the congressman. You were		
12	working and living in D.C. at the time?		
13	A. Yes. Like I said, I only went to med		
14	manag-, like to even do any of that was for		
15	to continue my Adderall.		
16	Q. So it looks like you went		
17	A. And then it evolved apparently		
18	because I have issues.		
19	Q. When you went to visit the physician		
20	on November 20th, there's a note here that		
21	you had exposure to chlamydia trachoma. Do		
22	you recall that?		
23	A. So Ryan had called me up and said,		
24	"We got a problem. I have an issue". And I		

Page 451 1 said, "What? I don't have anything". And so 2 we went and both got tested. He wound up 3 having a urinary tract infection, and we were 4 both fine. But yes, that was our fake STD 5 scare. 6 Okay. I think you had told the Ο. 7 doctor you had a recurrent urinary tract 8 infection. Do you recall that? Like I said before, I have bad 9 kidneys. I always have. I almost always 10 11 have a urinary tract -- I have a urinary 12 tract infection right now. 13 Okay. Do you have blood work done 14 that you're taking Adderall? Do you have 15 blood work done every six months or every 16 year to check your kidneys or kidney 17 functions? No? 18 No. I mean I have a urologist. Α. had a urologist, but this is something I've 19 20 been struggling with since way before I ever 21 took Adderall. 22 Q. Okay. And my kidney function, I mean I just 23 did have a workup with -- I mean I was in 24

		Page	452
1	the, I was hospitalized for it and saw a		
2	urologist for my last surgery, and it's fine.		
3	My kidney function is fine.		
4	Q. The note says you have a recurrent		
5	urinary tract infection back in 2019?		
6	A. I know the symptoms.		
7	Q. Okay.		
8	A. I've been getting them my whole		
9	entire life.		
10	Q. And it looks like, on that visit, it		
11	looks like well, let's see what we have		
12	here. You asked me about the		
13	Dextroamphetamine. It looks like we have		
14	some records from the urinalysis that was		
15	done, and on the record, it says that you		
16	were taking Dextroamphetamine 10 milligram		
17	tablets three times a day and you were taking		
18	Dextroamphetamine 20 milligram tablets two		
19	times a day.		
20	A. So you're def that's definitely		
21	Adderall, generic for Adderall. Because I'll		
22	tell you why. I started taking 20 milligrams		
23	a day.		
24	And the reason that I started taking		

		Page 453
1	20 milligrams of Adderall a day a long time	
2	ago, I was always on 30 and then we dropped	
3	it down because we thought that the heart	
4	palpitations, the PVCs that I had, were	
5	related to Adderall. They weren't. So, when	
6	I went to see Dr. Oshalim, I started on my 20	
7	milligram. I told him I wanted to increase	
8	back to 30 milligrams, and he and then I	
9	saw the Mindoula people, and that's when they	
LO	increased my dose back to 30 milligrams from	
L1	when they sto-, from when Dr. Zwil stopped it	
L2	becau well, actually, I told him that I	
L3	thought it might be Adderall related. So he	
L4	dropped it down to 20 and to see if my heart	
L5	function, if my heart issue would improve,	
L6	but it wasn't that.	
L7	Q. Okay. So your understanding was	
L8	that, even know it's, even though the record	
L9	states that you were taking	
20	Dextroamphetamine, your understanding is that	
21	was Adderall?	
22	A. Adderall. 100 percent, yes.	
23	Q. Okay. There are times though in the	
24	records where the doctor indicates that he's	

Page 454 1 prescribed Adderall for you, not 2 Dextroamphetamine. 3 Α. I'm almost positive it's the same 4 exact thing. Because I don't think that it's 5 -- because I've never taken anything other 6 than what I considered to be Adderall. But 7 maybe if I go look at my bottle right now, it 8 might say Dextroamphetamine. You also took a drug called Ser-, 9 looks like Sertraline. Do you remember this 10 11 at all? Do you remember any medication by 12 the name of Sertraline or something like 13 that? 14 So, when I first started seeing Α. Oh. those Mindoula people, they were like, "Well, 15 16 we don't know if the Zoloft is working for 17 Let's switch to what" -- they called it Lexapro, and I didn't like it. It was giving 18 19 me headaches or whatever, and they took me 20 off it and we switched back to Zoloft. 21 And it looks like you then had 22 subsequent visits with the psychologist, the next one being I believe on November 21, 2019 23 and it looks like you had an evaluation, and 24

		Page 455
1	it looks like the doctor concluded that you	
2	had no depression or anxiety or emotional	
3	problems or concerns at that session. Do you	
4	recall him telling you that?	
5	A. Yes. I mean I pretty much say that I	
6	don't have, suffer from depression or	
7	anything like that. Like I'm not a depressed	
8	person. I don't have periods where I think	
9	life isn't going to get better.	
LO	I always think, even as down as I	
L1	get, and sometimes I get pretty down, I	
L2	always think that tomorrow is another day and	
L3	that I'll be a survivor, I'll be fine. So	
L4	I'm not a depressed person by any stretch of	
L5	the imagination, and I never will be.	
L6	Q. And it also says on this one that you	
L7	are to continue your Adderall 10 milligrams I	
L8	guess a day	
L9	A. Twice a day.	
20	Q or twice a day?	
21	A. Uh-huh.	
22	Q. And it also says that you got this	
23	Dextroamphetamine 10-milligram tablet, take	
24	that once a day. So you were taking both the	

```
Page 456
 1
 2
       Α.
             No.
 3
             -- Adderall and Dextroamphetamine.
       Ο.
 4
       Α.
             That's not right.
 5
             Is that possible?
       Ο.
 6
             No, that's not right. I've never
       Α.
 7
     taken -- I've only taken my Adderall and the,
 8
     what do you call it, the, whatever is Zoloft.
 9
       Q.
             Okay.
             I don't know what that is.
10
       Α.
11
       Ο.
          Okay.
12
             I want to like look it up. Dextro-,
       Α.
13
     somebody Google "Dextroamphetamine, generic
14
     for Adderall".
15
             I did it this morning. You'll find
     it there. It's different from Adderall, but
16
17
     that's okay.
                   MR. CARSON: I looked. I think
18
            I saw it, Sidney, saying it also.
19
20
                   But maybe you should ask your
21
            doctor about it.
22
                   THE WITNESS: Okay, I will.
23
            Because --
                   MR. GOLD: Don't go by Google.
24
```

		Page 457
1	Do not rely on Google or Sid Gold, by	
2	the way, for medication.	
3	BY MR. GOLD:	
4	Q. Anyway, it looks like you then went	
5	and saw the, I guess you actually met with a	
6	psychiatrist on, sometime in January of 2020,	
7	and at that point, you had told the	
8	psychiatrist that you were taking the Zoloft	
9	and the Lexapro. Is that possible, both of	
10	them at the same time?	
11	A. You can't be taking both at the same	
12	time.	
13	Q. Okay. I'm sorry, it says a failed	
14	attempt on Zoloft you would try Lexapro. Is	
15	that more accurate?	
16	A. That's what I just said, yes.	
17	Q. Did it help you with your anxiety?	
18	A. No. I didn't like it. Remember I	
19	told you it gave me a headache.	
20	Q. Oh. Did the Zoloft, were you then	
21	put back on Zoloft?	
22	A. Uh-huh.	
23	Q. And what how does the Adderall	
24	help you?	

Page 458 1 It helps me concentrate, focus, be 2 organized and neat. I'm people that -- my 3 husband says like when I come home from work 4 you can see a trail of like where I've been. 5 It definitely stops and lets me know "sit 6 down, pay attention, focus and be organized". 7 It says here that your main Ο. 8 complaints were trouble with focus and concentration which attributes to her 9 ADHD, --10 11 Α. Uh-huh. 12 -- also anxiety due to family and Ο. 13 work situation leading to acting-out 14 behavior. Is that a comment you would have 15 made at that meeting with your psychiatrist? 16 Α. I mean I have had like some blowups 17 with my mom, you know. My mom considers them 18 acting out, so --19 He said the main focus would be to Ο. 20 find a therapist to help the patient cope 21 with the current stressors in her marriage 22 and forced separation from her family and help her gain some emotional stability. 23 Were you at that point separated from 24

```
Page 459
1
     your family, since you were living apart I
2
            Is that what was meant by that?
     quess?
3
       Α.
             Yes, it's very stressful.
4
             Did he eventually find you a
       Q.
5
     therapist?
                Is that how you --
6
             No. I started seeing somebody --
       Α.
7
     they wanted to just give me a therapist they,
8
     what they called a trauma therapist is what I
     was told, and I started seeing somebody but
9
     she was basically like, "There's nothing
10
11
     wrong with you. You're fine. As long as
12
     your decisions aren't hurting nobody, do
13
     whatever you want. You're a good person".
14
     And that's like all she would say to me every
15
     time. I'm like, well, this doesn't seem very
16
     constructive.
17
             And he renewed your prescriptions on
     that date again for the Dextroamphetamine,
18
     and again, no reference here to the Adderall.
19
20
     I guess so you had that filled at the Dupont
21
     Circle Pharmacy?
22
       Α.
             Yes, and I -- like I call that
23
     Adderall. That's what I get.
24
             I want to -- I like want to get up
```

Page 460 1 and find my Adderall bottle and see what it 2 says on there. 3 Okay. You were asked how often do Ο. 4 you drink alcohol. You said two, three times 5 a week. Does that sound accurate? 6 Sometimes not at all, but sometimes Α. 7 two, three times a week. 8 And you smoke, you're an everyday Ο. smoker, according to this back at that point 9 in time? 10 11 So I started smoking in 20--, in 12 October of 2018, actually really started that 13 December trip to England. Poor 14 decision-making on my part. And then I just 15 quit for about a month, had a little lapse 16 the other day. It is what it is. I'm 17 trying. 18 And at the end of the day, the doctor 0. concluded that you had no depression, no 19 20 anxiety or emotional problems, and no 21 psychiatric symptoms. Did he share that 22 finding with you after you met with him or --Which one? 23 Α. The --24 I think that's the psychiatrist. Q.

		Page 461
1	A. Yes. Because I'm not depressed, and	
2	I'm not like there's nothing chemically	
3	wrong with my brain.	
4	Q. Good.	
5	A. I've just been under, since The	
6	Middle East Forum, I've been under some	
7	serious mental constraints.	
8	Q. Now, you then saw the therapist on	
9	January 6, 2020, and then you met with the	
10	psychiatrist again on it looks like	
11	January 28, 2020. Again, he writes the main	
12	focus would be to find a therapist helping	
13	you cope with the stressors in your marriage	
14	and the forced sepa	
15	A. You're talking about the Mindoula.	
16	It's a woman.	
17	Q. I'm sorry. Mindoula, okay. And at	
18	that point, are you even seeing Mindoula in	
19	January 2020?	
20	A. Yes.	
21	Q. Okay. I think this is just	
22	repeating.	
23	A. And I'm thankful that I have been.	
24	Stephanie is great.	

Page 462 1 Okay. And then I guess you met with 2 Mindoula in February of 2020 and you had told 3 the therapist that you were anticipating a 4 promotion, you were married with two 5 children, and husband is a great friend but 6 haven't been intimate in two years, 7 anticipating divorce. Is that something you 8 would have told a psychiatrist or psychologist? 9 It's pretty accurate. My husband is 10 Α. 11 like my best friend in the whole world. I 12 told you that he's like a rock to me. We 13 vacillate on divorce often. You know, 14 sometimes we say "yes", then we say 15 "hell no", and we go back and forth. And it 16 is, it is an option that's still on the 17 table. 18 But were you anticipating a promotion 19 of sorts? 20 Oh, yes. Well, so my Chief of Staff 21 was leaving, and I was up for Chief of Staff. 22 I didn't even expect to be up for Chief of Staff. I had been there six months. 23 didn't even ask for that position. But I had 24

Page 463 1 been doing such a good job that my former 2 Chief of Staff said, "You're the only one 3 that I think should have it". 4 We had a Deputy Chief and we also had 5 a District Director and they both wanted to 6 leave, so I thought of course they would be 7 first in line. I had just gotten there. And 8 she was like, "You're the only one that's 9 capable, and I'm recommending that you get the job". And I was like, "What"? I was 10 11 totally not expecting that, totally out of 12 left field. 13 It turns out that last minute we had a new Chief of Staff come in and she had 14 15 19 years' experience as a Chief and ties to 16 the district, and honestly, I was a little 17 bit relieved that I didn't get that job. Because with everything I have going on right 18 19 now, I don't know -- I don't know that this is the right time for that position. 20 21 But yes, I was anticipating that. 22 Yes, it was talked about quite a bit. And 23 the congressman's wife even said, "I want you to be our Chief". She actually just re-said 24

```
Page 464
1
     that to me again. She's like, "How long do
2
     you think that So-and-So wants to do this"?
3
     I said, "She's going to be here forever", and
4
     she's like, "Ugh", she's like, "I'm hoping
5
     that you're our Chief".
6
             I think when you met with Dr. Ziv you
       Q.
7
     told her that this job was probably the best
8
     job you've ever had, --
             And it definitely --
9
             -- you were thriving in this job.
10
       Ο.
11
     that accurate?
12
             It's like a family work environment.
     People are kind. They don't harass you.
13
14
             You're happy there? You're happy
       Ο.
15
     there? It looks like you're going to get,
16
     you're being successful there, I take it?
17
             Yes, very.
       Α.
             And it's very fulfilling, I take it,
18
       Q.
     given whatever your expectations might be?
19
20
      Α.
             Yes.
21
             You also told the psychologist that
22
     you and your husband were dealing with IRS
     troubles and are not financially sound.
23
24
       Α.
             That's correct.
```

Page 465 1 And that you're hearing negative 2 feedback about her parenting so they haven't 3 been speaking for two months? 4 Α. About what? 5 Something about you were getting 6 negative feedback about your parenting and 7 because you haven't been there, maybe because 8 you hadn't been there for two months? Oh, about my -- no. My mom for the 9 10 last couple months I probably said has been 11 like, you know, she's like, "The kids are always like saying Vasili, Vasili, Vasili. 12 13 You need to be the one at home to put your 14 kids to bed and wake them up in the morning 15 and pick them up from school". I'm getting 16 that from my mom. 17 So she was criticizing your parenting skills I guess because you were working in 18 19 D.C. and not at home? 20 Α. Right. 21 Now, were you coming back for the 22 weekends or were you --Sometimes I do even more than that. 23 Α. Thankfully, coronavirus has actually been a 24

```
Page 466
1
     Godsend in that because we're allowed to work
2
     from home, so sometimes I spend weeks at
3
     home. But I -- the plan was, when I moved
4
     down here, to go Friday, Saturday, Sunday and
5
     drive home. I've been -- I did that
6
     regularly before coronavirus. Sometimes I
7
     would even go home Wednesday nights.
8
             But yes, that was the plan, and then
     now it's been like, you know, I'll do like
9
     four days or three days or, you know,
10
11
     depending on like the kids' school schedule,
12
     my work schedule, the things that I need to
13
     be home for, that kind of thing.
14
             I also have to fly to Texas here and
15
     there, so my mom is not loving that. But I'm
16
     not -- I mean not that I don't love that.
17
     You know, I just --
             This February 18th visit you told
18
       Q.
     your psychologist that you had a boyfriend
19
20
     who is also not stable, --
21
       Α.
             Ryan.
22
       Q.
             -- that his interactions with you,
23
     even though she is in love with him, you
24
     added that, --
```

Page 467 1 With seven women. So yes, that's --Α. 2 -- you added that you're in constant Ο. 3 fear of abandonment and that he's consuming 4 your life. Is that a statement you made? 5 Did she quote me on that? Because it 6 doesn't sound how I speak. I don't say I 7 have a fear of abandonment. 8 I'm reading from the report. Did you Ο. have a boyfriend at the time? 9 Α. 10 Ryan Coyne. 11 And were you in constant fear that he Ο. 12 would abandon you? 13 I didn't think so. 14 Okay. And it says here that you were Ο. in love with him but yet you had this fear of 15 16 abandonment. It says that you've been 17 working this, been working on this for the last ten years. Would that be this -- do you 18 19 have a sense that --20 I mean I don't know if the fear of 21 abandonment is like the way to put it. Like 22 I guess that's how she's classifying it. 23 But I mean I definitely have a thing with my family, like my family. It's always, 24

Page 468 1 like I just said, like loved ones; that if I 2 don't, if I'm not like the perfect mom or the 3 perfect wife or the perfect student or the 4 perfect whatever, I don't know, if -- like I 5 guess I have like a thing where if, and it's 6 only in my inter-, very interpersonal 7 relationships, but if -- like if I mess up, 8 you know, then, I don't know, I guess they 9 won't love me anymore. 10 Okay. You said that you had, it says Ο. 11 here that you reported that you had been, it 12 says here, "She has been more excessive in sexuality and drinking". This is in February 13 14 of 2020. That's what you reported --15 That's pretty accurate at the time. Α. 16 Was there any reason why you became Ο. 17 more excessive in your sexuality and 18 drinking? I think that I just wanted to like, I 19 Α. don't know, like escape my little, crazy 20 21 world that I'm, that is now because of MEF, I 22 It's been a very hard few years. guess. 23 It says here that you feel the need Q. to go out and meet people. She added that 24

```
Page 469
 1
     her boyfriend, when your boyfriend, that if
     her boyfriend is not around she will date
 2
 3
     someone else.
 4
       Α.
             I think what she means "not around"
 5
     we would break up. Like he would -- well, we
 6
     would have -- like I said before, we were on
 7
     again, off again. Turns out he was flying
 8
     other chicks to the Virgin Islands. So, when
     I found out, I wanted to see other people so
 9
     that, you know, I wouldn't care about what he
10
11
     was doing anymore.
12
             And when that started in February --
       Ο.
13
     when did your relationship end with, I think
14
     you said Ryan or who is this?
15
             Yes, at the end of March.
       Α.
16
             Okay. So this is now March of 2020?
       Ο.
17
       Α.
             Yes.
             And how long had you been seeing him?
18
       Q.
             Since September of 20-- --
19
       Α.
20
             '19?
       Q.
21
             -- --19, yes.
       Α.
22
       Q.
             So you were pretty serious with him?
23
     I guess that was a long-, kind of a long-term
     relationship?
24
```

Page 470 1 Yes. It was, like I said, a little Α. 2 on again, off again, but yes. 3 Now, the doctor saw you again on Ο. 4 February the 6th. That's the, I guess that's 5 the, your primary care doctor, and he entered 6 in his records that you were not suffering 7 from any depression or anxiety or any 8 emotional problems or concerns. Is that 9 accurate? Like I said, I have like these 10 Α. Yes. 11 ups and downs of like, you know, I can get 12 through this, I'm fine, I'm feeling good, and 13 then I get a call from Seth and then my 14 freakin' day is ruined. 15 And he also indicates that he Ο. prescribed for you Dextroamphetamine, 16 17 Ibuprofen, Lexapro, and I guess that other 18 drug that in lieu of the Zoloft you were 19 taking. I guess it's the -- is it Lexapro? 20 Do you recall why he --21 You can't be on them concurrently. 22 was never --So this other drug is Sertraline or 23 Q. something. Do you remember taking that 24

			Page	471
1	medicat	ion, 50 milligrams one times a day?		
2	A.	I think that's Zoloft.		
3	Q.	Okay. And the Lexapro so you were		
4	taking :	Lexapro and that together?		
5	A.	No. You can only take one. I was		
6	only ta	king Zoloft.		
7	Q.	Are you allowed to drink with these		
8	medicat	ions? I mean		
9	Α.	Yes, actually.		
LO	Q.	You are?		
L1	Α.	Yes.		
L2	Q.	Okay. Why did the doctor prescribe		
L3	Ibuprof	en? Were you having some kind of pain		
L4	or some	thing? 600 milligrams twice a day?		
L5	Do you	have any recollection?		
L6	Α.	When was this, February?		
L7	Q.	This is February of 2020.		
L8	Α.	I broke my foot. That wasn't it.		
L9	That wa	s recently.		
20		I don't remember. I might have done		
21	somethi	ng. I don't know. I'm very klutzy.		
22	Q.	In March, he saw you about your		
23	primary	care doctor again, and it looks like		
24	you had	some contact with somebody who had		

		Page 472
1	the coronavirus. Do you recall that?	
2	A. Oh, I wanted to be tested for	
3	coronavirus.	
4	Q. He writes suspected,	
5	A. I was travelling.	
6	Q suspected disease caused by 2019	
7	novel coronavirus.	
8	A. Yes. So I was sick and my parents	
9	and my parents didn't want me to come around	
10	them unless, because I had been travelling,	
11	if I, if I didn't get tested for coronavirus,	
12	and so I got tested for coronavirus.	
13	Q. Okay. He also wrote down that you	
14	stopped the Zoloft and you stopped the	
15	Lexapro?	
16	A. I had al I had not been on the	
17	Lexapro since whenever, and I ac I don't	
18	accidentally. I don't remember always to	
19	take all of my medicine all the time. Like I	
20	don't sometimes I even forget to take my	
21	Adderall.	
22	And so I, at one point, had stopped	
23	taking my Zoloft for like a while. I just	
24	started. Actually, it's been for months. I	

Page 473 1 just started up again like last month again. 2 Okay. And, again, he noted that Ο. 3 you're not suffering from any depression or 4 anxiety or any emotional problems. 5 Then we go to February the Okay. 6 I guess this is another meeting with 7 your primary care doctor. Nothing there 8 significant, except to say that you weren't suffering from any anxiety or depression or 9 any emotional problems or any psychiatric 10 11 symptoms. Again, he prescribed the 12 Dextroamphetamine, Ibuprofen and the Lexapro. 13 I don't know what the Ibuprofen is 14 for. 15 Okay. So now we're up to a visit Ο. that occurred on March the 3rd, and you 16 17 reported that you were feeling pretty good and that you had a good vacation last week. 18 Were you on vacation the first week of March 19 20 this year? 21 I was with Ryan in Puerto Rico. Α. 22 Q. Who is that? 23 Ryan. Α. Oh, Ryan in Puerto Rico. Okay. 24 Q. And

Page 474 1 where were you in? Puerto Rico or --2 Where was that? Or maybe that was my Α. 3 trip to Vegas with him. I don't know, one of 4 the two. 5 Was that for that Tyson Fury fight? Ο. 6 Uh-huh. Α. 7 How did you meet him, by the way? 0. 8 Α. How did I meet who? 9 Q. Ryan. 10 Α. He randomly saw me at a bar. 11 Okay. I think you referenced that Ο. 12 earlier today. And it says here that you 13 reported that she has been, reported that you 14 had been sexually abused when younger. 15 that accurate? 16 Had a weird thing one time when I was 17 younger. I was in a car -- and they didn't have cabs back then. And I was waiting for a 18 19 ride home, waiting for a ride home, and I 20 like called a cab company. And, finally, 21 this like pickup truck person came, it was 22 down in Wildwood, well, it was The Villas 23 actually at the time and I needed to get back to Sea Isle. And he said, "I'll give you a 24

```
Page 475
1
     ride home", and I was like "Awesome". Poor
2
     judgment on my part.
3
             I fell asleep in the car. I woke up
4
     to him with his hands inside me.
                                       I didn't
5
     say anything. He dropped me off. I never
6
     heard, never saw that person ever again.
7
             Did you report that to anyone or is
       Q.
8
     this the first time you reported it?
             I'd never, I'd never tell anybody
9
     that stuff, no.
10
11
       Ο.
             And I think --
12
      Α.
          Well, --
13
       Ο.
             -- you referenced that in these
     reports here. I'm not going to belabor that,
14
15
     don't worry.
16
                   MR. CARSON: Yes. I mean can
17
            we, if we file any exhibits, can we
18
            do that under seal? In fact, --
                   MR. GOLD: Pardon me?
19
20
                   MR. CARSON: If we file -- can
21
            we mark that confidential just --
22
                   MR. GOLD: Yes, we would not
23
            file that in any kind of public
            record, so don't worry about that.
24
```

```
Page 476
1
                   MR. CARSON:
                                Thank you.
2
                   MR. GOLD: And if it comes up,
3
            we will.
4
                   MR. CARSON: Thank you.
5
     BY MR. GOLD:
6
             All right. So then you saw your
       Ο.
7
     therapist again on March the 10th, and you
8
     reported that the use of, that you -- you
     reported that you discontinued the use of
9
     Lexapro because of the abnormal side effects,
10
11
     and you explained that she often is at events
12
     for work and noted that she --
13
             That's right, I forgot about that,
           I noticed that when I was taking that
14
     and I would like, I would have like a drink,
15
16
     like a drink or one. I remember one time I
17
     went out for a karaoke event, I wasn't even
18
     gone two hours, I came home and I had like
19
     one drink, and I was like blackout. My --
20
     was it my roommate said that I was like
21
     paralytic I think was what she said. I had
22
     like one or -- she's like, "There's no way
23
     you could have gotten that drunk in two
24
     hours", like it was -- whatever.
```

Page 477 1 So yes, I forgot, that was another 2 reason why I stopped it, that and the 3 headaches. 4 When you get your prescriptions, Ο. 5 there's usually something in the bag that 6 tells you the things to be cautious about. 7 Do you ever read those, the warning signs or 8 any of those? 9 No. But I asked her, I asked her about that afterwards, and she's like she 10 11 never had a patient that complained about 12 that but it was something that happened to 13 me. 14 Ο. Okay. 15 It happened more than once or I Α. 16 wouldn't have put that together. That was 17 the only thing that was different. 18 It says here that you drank three Q. drinks and that you blacked out and vomited? 19 20 Α. It was bad. That was a bad Yes. 21 night. But that wasn't the only time it 22 happened. It happened another time. Ιt 23 happened twice. Okay. I'm trying to get moving 24 Q.

		Page	478
1	through these here. It looks like you saw		
2	the doctor again on March the 4th.		
3	A. Are we going over every single		
4	Q. Oh, I only have selected ones here.		
5	I don't have every one of these.		
6	A. God, it feels like it's every week		
7	you're going about		
8	Q. You saw these doctors quite a bit.		
9	You said that, when you saw the doctor on		
10	March the 4th, you told the doctor you		
11	suffered from imposter syndrome. What is		
12	that? What do you mean by that?		
13	A. Someone said that once to me that		
14	they think that I suffered from that.		
15	Sometimes I don't think that like I'm good		
16	enough. Like, like, you know, you're in an		
17	Ivy League school and you're a kid from		
18	community college. Sometimes you don't feel		
19	smart enough to be there. And sometimes I		
20	don't feel like I'm good enough. I mean, but		
21	I think that a lot of people suffer from		
22	that.		
23	Sometimes I don't feel smart enough.		
24	Sometimes I don't feel like, you know, like I		

Page 479 1 can compete academ- or mentally sometimes. 2 But then I get -- and everybody is praising 3 Sometimes it just doesn't add up, you me. 4 Like sometimes I don't think I'm as 5 good enough as other people say that I am. 6 It also said that your on-and-off Ο. 7 relationship with your boyfriend was causing 8 you added stress. Was that becoming stressful for you in March of 2020? 9 I guess. But she also said that I 10 Α. 11 used my relationship, in later events with 12 her, she said that I used him as a 13 distraction from like Middle East Forum and 14 from other things in my life. Instead of 15 focusing on like these distractions, I put my 16 focus into like Ryan. 17 So I don't know, but it was -- you know, who wants to be breaking up with a 18 19 boyfriend and find out they're cheating on 20 you? It's not fun. 21 You said he had, you said he had been 22 cheating on you and actually was involved with seven more other women or something? 23 24 Yes, that's correct. Α.

		Page 480
1	Q. How did you find out about that?	
2	A. A girl messaged me on Instagram, and	
3	then I looked in his phone and there they all	
4	were.	
5	Q. And had he been meeting with those	
6	women from the very onset of your	
7	relationship?	
8	A. I guess more in, yes, November,	
9	December, yes. I didn't know about it	
LO	though.	
L1	Q. And	
L2	A. He would like say, "Come with me to	
L3	San Francisco", and I said, "I can't". So he	
L4	would fly somebody else out there.	
L5	Q. Did you confront him after you found	
L6	the information on his phone?	
L7	A. I did.	
L8	Q. What happened?	
L9	A. We got in an argument. I was in	
20	Puerto Rico. I stayed in Puerto Rico.	
21	Q. With him?	
22	A. Yes.	
23	Q. It says I think it references that	
24	Puerto Rico trip. Were you you wanted to	

Page 481 1 go jet-skiing and he didn't want to go. 2 that in Puerto Rico? 3 Α. Yes. He's not as -- she was asking 4 me that because she was asking like what I 5 actually like about him, like, you know, I 6 don't know, whatever. And she was like, 7 "What are things that you don't like about him"? I'm like, "I don't like he's not as 8 9 adventurous as I am". 10 I wanted to go jet-skiing. He's 11 like, "I don't feel doing that". So he 12 watched. He was cute, he took pictures while I was out there, but yes, he didn't want to 13 14 go. 15 Okay. Then you met -- I'm moving Ο. pretty quickly now. March 24, 2020, you told 16 17 your doctor you were feeling terrible and that your whole world had fallen apart, and 18 you shared with her that your shithead 19 20 boyfriend is seeing two other people, stated 21 that you were concerned about your 22 vulnerability with STDs due to his 23 indiscretions. Is that what you told the --24 That's definitely a worry. But I Α.

Page 482

- 1 | didn't have anything, so we were good.
- Q. You reported that you were, that you
- 3 | were -- actually, I quess you did this thing
- 4 from Puerto Rico. It says reported that
- 5 | you're still in Puerto Rico and that you're
- 6 still with this, with your boyfriend, and you
- 7 expressed a feeling that she is not, that he
- 8 is not romantic, noting that they are back in
- 9 | the friend mode. Is that what you told the
- 10 therapist?
- 11 A. Well, we got -- he was like -- once I
- 12 | found out, it was like his little, his little
- 13 like scheme. He wasn't like "hey baby".
- 14 Like it was all in black and white now. He
- 15 | wouldn't lie to me about it, you know.
- 16 So then he was like being cold
- 17 because I was being cold. I don't know. He
- 18 | tried to be romantic after that later. So I
- 19 don't know, it was very off and on I told
- 20 you.
- 21 Q. And you saw the doctor a week later
- 22 on March 31st and reported that you were
- 23 | feeling terrible and that --
- 24 A. It's not fun when you find out

Page 483

somebody you love cheated on you.

1

2

3

4

5

6

- Q. You said you hadn't been in a great place and you were doing things that were emotionally unhealthy?
- A. Yes, like staying there after I found out he cheated on me.
- 7 You spoke about your boyfriend Ryan. Ο. 8 Found out that he had a whole, that she had, noting that she had found out that she had a 9 whole other relationship with another, meant 10 11 he, with another girl. Noted that she and 12 Ryan began arguing over the other woman. 13 shared that she recorded the conversation 14 with Ryan and when he was nasty so that she 15 could share it with the other girl. You 16 explained that she left Puerto Rico that day 17 after a blowout on March 28th, noting that 18 she had been crying ever since.
- 19 A. I probably was. It was a very hard 20 day.
- Q. Okay. And you talked about gas
 lighting in relation to Ryan. What exactly
 is gas lighting? What does that mean?
- A. Like he says like "you're crazy, that

		Page	484
1	didn't happen" when it's right in front of		
2	your face and you know it happened, and you		
3	start to think you're crazy because you saw		
4	it with your own eyes.		
5	Q. Did you actually play that recording		
6	to the other girl he was seeing? Did you		
7	actually relay that recording or not?		
8	A. Courtney, yes.		
9	Q. Courtney okay. Courtney is a		
LO	friend of yours I understand it?		
L1	A. Yes.		
L2	Q. So he was actually seeing a friend of		
L3	yours?		
L4	A. No. We became friends after, through		
L5	the whole thing.		
L6	Q. Okay. So he started seeing Courtney		
L7	while he was seeing you, and then you became		
L8	friendly with Courtney thereafter?		
L9	A. She broke up with him before I found		
20	out because he had been distant because he		
21	was travelling with me.		
22	Q. Okay. You reported that you were,		
23	you did try dating Steve?		
24	A. Yes, Steve was nice.		

		Page 485
1	Q. Who is that?	
2	A. A guy I met. He was nice. He liked	
3	me a lot. Really nice to me. I just wasn't	
4	into him. Didn't like him.	
5	Q. Yes. You said that he doesn't feel	
6	like he's, that you're it does not feel	
7	like he's loving her and that you feel	
8	unlovable again.	
9	A. Steve loves me.	
10	Q. Pardon me?	
11	A. Steve still loves me. Maybe it's	
12	Ryan that I felt like didn't love me.	
13	Q. Okay. And then April you went, you	
14	had another session, and it looks like	
15	A. Can I have a break for a minute?	
16	Q. Yes, go ahead.	
17	A. I just need	
18	Q. Take a break. Take a break.	
19	A. I'm getting like	
20	Q. Take a five-minute break.	
21	A. You're killing me.	
22	THE VIDEOGRAPHER: 6:56 p.m.,	
23	we're going off the record.	
24		

```
Page 486
1
                 (A recess occurred.)
2
3
                   THE VIDEOGRAPHER: 7:08 p.m.,
4
            we are back on the record.
5
     BY MR. GOLD:
6
             I'm going to read from another -- you
       Ο.
7
     also -- this is an entry that was made by, on
8
     May 5, 2020, which is not that long ago
     actually. You reported that you had been in
9
     a good mood. She explained that something
10
11
     unhealthy happened, noting that Ryan messaged
12
     her adding that she was at his house from
13
     Wednesday to Saturday. Patient stated that
14
     they are friends and are working together,
15
     noting that it upset Courtney. She is
16
     understanding. She stated that on a positive
17
     note she wanted to start working or start
     walking, oh, three miles a day and -- so it's
18
19
     fair to say that as of May you were in a
20
     better place and time in terms of your
21
     psychological being? Would you agree or not
22
     really?
             I mean, like I said, a lot of times
23
       Α.
     it's context-dependent. But, you know, with
24
```

Page 487 1 my Middle East Forum stress, I'm never in a 2 good place. I mean, if I'm having a good 3 day, I'm having a good day. 4 Okay. Well, I know you, I know you Ο. 5 want to attribute everything in your life to 6 that, but --7 I don't want to attribute everything Α. 8 in my life to that. 9 MR. CARSON: Lisa, Lisa, just wait for a question. Just wait for a 10 11 question. 12 BY MR. GOLD: 13 It states here that you were concerned that her boyfriend Ryan called and 14 she jumped. No regard for family friend 15 16 Courtney and blew off work on Friday, noting 17 that she felt like a junkie addicted to Ryan. 18 Also, patient stated that she hung out with 19 Courtney in between. Patient explained that 20 she puts people on a pedestal. However, if 21 something gets on her nerves, she starts to 22 pull away from them. She stated that she is aware that her behavior is destructive. 23 24 Can you explain what happened there?

			Page	488
1	You got	a message from Ryan?		
2	A.	Ryan probably called me and said		
3	"come o	ver", and I did.		
4	Q.	And you did. And you were with		
5	Courtne	y at the time?		
6	Α.	Probably. Yes, and it probably hurt		
7	her fee	lings that I was going over there.		
8	Q.	That was in May of 2020.		
9	Α.	Yes.		
LO	Q.	When did that relationship end?		
L1	Α.	With Ryan?		
L2	Q.	Yes.		
L3	Α.	In March.		
L4	Q.	Well, this is now May of 2020. I		
L5	guess i	t's still going on.		
L6	Α.	I mean I was with him yesterday.		
L7	Q.	Okay. So you're still with him, but		
L8	a diffe	rent kind of relationship right now?		
L9	Α.	We're not like we're not, right		
20	now, we	're not sleeping together. We're just		
21	friends	. I went to watch the election with		
22	him.			
23	Q.	Would you hope that you could		
24	reignit	e that romantic relationship again?		

Page 489 1 Α. I vacillate. 2 And you actually told your Ο. 3 psychologist in May 26th that you were 4 preparing to leave the relationship with your 5 boyfriend and that you would go 90 days 6 without any romantic interaction with Ryan. 7 Try to distract and see if she feels like 8 going back to Ryan. So were you like on the fence I guess 9 at that point in time? 10 I'm on the fence a lot with him. 11 Α. 12 Right now, he's irritating me. So yes. 13 And then on May 28th you told the physician that you, the therapist, that is, 14 15 that you were feeling okay, you're back in 16 Texas, noting that she had a good trip. 17 Explained that Courtney and her family are 18 great, knowing she is trying to remain calm 19 and not get into her own head. Patient 20 stated she got into a little tiff with her 21 parents regarding her children but it's over 22 the Ryan thing. She explained that Ryan is now seeing another woman and that another 23 woman that is similar to Courtney. 24

		Page 490
1	What does that mean, another woman	
2	similar to Courtney?	
3	A. He was so Courtney was the pageant	
4	girl. She was Miss Virginia. Alba was, in	
5	2004 I want to say, yes, runner-up for Miss	
6	Universe.	
7	So she was a pageant girl. So she	
8	looked like me, tall, dark hair, softer	
9	features, but she was like a lefty pageant	
LO	chick, which Ryan is a righty. Courtney is a	
L1	lefty pageant chick.	
L2	Q. You mean Courtney is a righty and	
L3	A. No, Courtney is a lefty.	
L4	Q. Okay. Meaning left-wing philosophy?	
L5	Okay.	
L6	A. Real like social justice warrior.	
L7	Q. Okay. You said that you would like	
L8	to have your children move with her to	
L9	Virginia full-time.	
20	A. I do.	
21	Q. "CM", is that your therapist? CM	
22	encouraged, or is that Courtney, "CM"?	
23	CM encouraged the plaintiff to explore her	
24	core beliefs as they relate to her parents	

		Page 491
1	I guess that's your therapist, "CM"? I don't	
2	know who that is.	
3	A. Stephanie was my therapist. I don't	
4	know who "CM" is either.	
5	Q. CM encouraged patient to explore her	
6	core beliefs as they relate to her parents	
7	and to explore where conflict may be arising.	
8	Were you still having conflicts with	
9	your parents at that point in May of 2020?	
10	A. Not really.	
11	Q. Patient discussed the underlying	
12	issues. She wants, for example, she wants	
13	mother to be there for her when needed. Is	
14	that in reference to your mom?	
15	A. Yes. Like my mom is like tough. You	
16	know what I mean? She's always been like	
17	that. She's a tough woman.	
18	Like when I found out that you guys	
19	subpoenaed my boss, I was crying, I was	
20	sobbing, right, like just because he doesn't	
21	need that crap. And I called my mom and I	
22	was like, "Listen to what they did", and she	
23	said "toughen up" and she started screaming	
24	at me. She didn't even say it like saying	

Page 492 1 it's going to be all right. She was like, 2 "Toughen up. Nobody else is crying in the 3 corner". 4 Like that's just how my mom is. 5 Sometimes I'd like her to pat me on my head 6 and say, "Everything is going to be okay", 7 but you know what, she does me a service by 8 telling me to like toughen up. You told the therapist that you 9 didn't want to blame, you didn't want to 10 11 share why she is sad because she feels her 12 mother will blame her instead of just being 13 there for her when she needs her. 14 Like just -- that's exactly the 15 example I just told you, blamed me for not 16 being tough enough. 17 And this is now at about the same time. Gone past that. This is on in May. 18 19 This is probably in relation to your, the 20 answer that you had referred to earlier when 21 you were I guess younger. It says was in a 22 car, got into an argument with her boyfriend 23 in a cab, was sitting on the curb for a ride 24 home, some guy in a pickup truck drove her

		Page 493
1	home. Is that the incident you were	
2	referring to? Okay.	
3	A. (Witness nodded).	
4	Q. And that occurred when you were	
5	A. Younger. I was under 18.	
6	Q. You were in Wildwood at the time?	
7	A. Yes.	
8	Q. And then you said you your hus	
9	you wanted they recommended or you	
LO	wanted to go through some marriage counseling	
L1	but your husband wasn't on board?	
L2	A. Correct.	
L3	Q. Do you recall that?	
L4	A. Yes. He doesn't, he doesn't believe	
L5	in therapy.	
L6	Q. And this is on June 30, 2020. You	
L7	said you had an addiction problem,	
L8	narcissistic sociopathic relationships.	
L9	A. Well,	
20	Q. She explained that this passed when	
21	Ryan contacted her and she got ready to go	
22	meet him. Patient stated that she had plans	
23	with Courtney on Thursday and Friday, left	
24	Wednesday night to try and meet up with Ryan.	

		Page 494
1	Patient explains that she was at Courtney's	
2	house and was upset because she didn't,	
3	because he didn't follow-up with calling her	
4	to hang out. Patient stated that she left	
5	Courtney to see him, noting that she also	
6	didn't go to work on Friday. Patient	
7	explained that she has zero	
8	A. Didn't we already talk about this?	
9	Q. Did we cover this one?	
LO	A. Yes.	
L1	Q. Okay. This one is dated June 30th.	
L2	So I think what I had reiterated to you was	
L3	what the doctor had referenced when he	
L 4	referenced that particular	
L5	A. Incident.	
L6	Q. Yes.	
L7	Okay. This will be the last one I	
8.	want to cover with you in August 2020. For	
L9	some reason, have you seen this therapist	
20	since August of 2020?	
21	A. Yes.	
22	Q. Because his notes stop as of August.	
23	The therapist's notes stop as of August 2020.	
24	Any reason for that?	

Page 495 1 I mean sometimes with her, like 2 sometimes I would see her once every two 3 weeks. We started doing once every two weeks 4 for a while, but -- and she was also trying 5 -- August? What month are we in? 6 We're now in November. Ο. 7 Yes, yes, I've seen her. Α. 8 Okay, so we'll have to get the rest Q. of the records. 9 During that last visit we have in 10 11 August 25, 2020, you stated that you and your 12 husband were arguing again last night and you 13 were trying to figure out how to plan your 14 lives together. Was that resolved or --15 I mean the conflict is he doesn't Α. want to move to D.C., and I don't have any 16 17 work up there. I need to have health insurance for the kids and he doesn't want to 18 19 move to D.C., and I don't have any work up 20 there. And I can't keep living like this. 21 I'm going to come back to the meeting 22 you had with Dr. Zakireh. You had denied any 23 history of domestic violence and that you 24 never got a protective order against your

Page 496 1 husband. That's not in your marriage. 2 You indicated, she indicated 3 occasional loud arguments with her husband, 4 and it did indicate that she was physically 5 assaulted by her boyfriend in the past. And 6 who would that have been? 7 Α. Danny Tommo. 8 Ο. Who had been drinking and struck her in the face causing the bruise. That's the 9 earlier testimony you gave relating to that. 10 11 The police arrested him, but she did not seek 12 a restraining order. Ms. Barbounis also 13 stated that she dated a male acquaintance and 14 was --15 Oh, they're talking about Bobby. 16 That was Bobby. That was when I was like --17 that was the same boyfriend that I was arguing with. I had dated him for four 18 19 years. 20 The guy with the Eagles game? Ο. 21 Correct, that was him. He was --Α. 22 Q. Okay. 23 So that was -- he didn't actually Α. punch me or anything. I went to grab a drink 24

Page 497 1 out of his hand and he turned around like and 2 his hand hit me, and the police came and they 3 arrested him anyway, yes. 4 It says here he had been drinking and Q. 5 she struck her, he struck her in the face 6 causing a bruise, but you're saying --It was a red mark. It wasn't even a 7 Α. 8 bruise. It was just red because they had come at the same time. 9 And that occurred when? What year? 10 Ο. 11 Early, my early 20s. Α. 12 Okay. And you stated that you had Ο. dated a male acquaintance who was involved 13 14 sexually -- and was involved sexually with 15 him while in England circa October 2018. 16 Α. Danny. 17 However, he unexpectedly engaged in rough sex with her, became extremely 18 19 physical, and caused a bruise to her eye. 20 That's what you had referred to earlier? 21 Α. Exactly. 22 Q. Correct? 23 Α. Yes. That's Danny, yes. 24 And you told the doctor you were Q.

		Page 498
1	satisfied with your current position, and you	
2	weren't having any kind of disciplinary	
3	problems on this job. In fact, you were	
4	doing quite well, correct?	
5	A. Correct.	
6	Q. You told Dr. Ziv that you were	
7	effective in your new role?	
8	A. Yes.	
9	Q. And you said, "They love me. I've	
10	really done good work for them. They adore	
11	me". Is that accurate?	
12	A. That is true.	
13	Q. That your boss is flexible. She lets	
14	you he lets you work from home. And that	
15	you were able to recently reconnect with your	
16	children over a nine-day span. Is that	
17	somewhat accurate?	
18	A. Uh-huh.	
19	Q. Okay.	
20	THE COURT REPORTER: Yes?	
21	BY MR. GOLD:	
22	Q. Said that your life improved recently	
23	but remarked, "This is not the life that I	
24	thought I was building". You had not	

		Page 499
1	finished your Master's degree, and you say,	
2	"Honestly, right now, I don't have the	
3	bandwidth to finish that degree".	
4	Do you think you'll go back and	
5	finish that?	
6	A. I would hope so. The problem is is	
7	that I stopped my degree because of all	
8	this like I couldn't do it at The Middle	
9	East Forum. Like I stopped that.	
10	After that November when we told	
11	Daniel everything, there was so much going	
12	with the stress of the Middle East Forum that	
13	I didn't in that, what was it, January, I	
14	asked for a leave. And they granted me a	
15	leave, I think, yes, they granted me a leave,	
16	and then I was supposed to return and I	
17	Q. Who is "they"? The congressman?	
18	A. No, the school, the Master's program.	
19	Q. Okay. But you only need three more	
20	credits, right?	
21	A. Yes.	
22	Q. You got one course?	
23	A. Three more classes.	
24	Q. Okay. So can't take that online or	

Page 500 1 something? 2 I haven't honestly explored it. Α. 3 Because I think that the way Penn works is 4 that you only have a certain amount of time 5 where you can return. 6 But I have -- and honestly, right 7 now, with this four lawsuits and being away 8 from my kids and being in a different state and commuting all the time, I honestly don't 9 have the capability to do a class, not even 10 11 It's very upsetting. one. 12 You said that you told Dr. Ziv that Q. 13 your life has improved. You said that you're 14 finally enjoying your kids. You stopped 15 smoking. You're more engaged with your 16 children. You're reading books to your 17 children, playing games, hide-and-go-seek. 18 Working on improving your relationship with 19 your husband. 20 Α. True. 21 Your husband had been dating his 22 assistant, but you didn't want to stop it 23 because you would consider yourself to be a hypocrite. 24

			Page	501
1	Α.	Correct.		
2	Q.	Correct?		
3		Has he stopped that though?		
4	A.	I don't think so. I don't know. He		
5	doesn't	really te he's not as forthcoming		
6	with that information as I am with him.			
7	Q.	You did ask your husband to move, to		
8	relocat	e to D.C. with you, correct, or		
9	Arlingt	on?		
10	A.	Either one.		
11	Q.	Okay.		
12	A.	It doesn't matter. I live 11 minutes		
13	from the Capitol.			
14	Q.	And you said that you didn't feel		
15	like yo	u had a leg he did not want to move		
16	I guess	to D.C.?		
17	A.	Well, he doesn't think that his		
18	busines	s can handle it. Like a lot of real		
19	estate	is referral-based and he thinks that		
20	it woul	d take a financial, a big, huge		
21	financi	al hit should he relocate, and I would		
22	underst	and that. But, you know, it would be		
23	a hards	hip.		
24	Q.	Okay. You said you didn't feel like		

		Page 502
1	you had a leg to stand on when you asked your	
2	husband to relocate because you, quote,	
3	ruined, she ruined her old life by doing	
4	exactly what she loathes other women were	
5	doing. Is that in reference to the fact that	
6	he was cheating on you and	
7	A. I think that it's I think that it,	
8	you know, my marriage all like went	
9	downhill because I was in a bad mental spot.	
LO	I made the decision. I'm not placing all the	
L1	blame on like The Middle East Forum, but I	
L2	made the decision, the shit decision to like,	
L3	you know, strike a relationship up with	
L4	Danny. And I made that decision and	
L5	subsequent decisions because my head wasn't	
L6	in a good place at all.	
L7	And so, you know, I feel I always	
8	said I would never be that person, that I	
L9	would be a loyal person.	
20	Q. Right now, you're happy at your job.	
21	You're making more money than you made at The	
22	Middle East Forum. It sounds like you have a	
23	lot more responsibility.	
24	A. I also have more debt. I have to	

		Page 503
1	have an apartment here. I have to commute	
2	back and forth. If anything, I'm overdrawn	
3	on my account almost every month because I	
4	have to have two house payments, and it's	
5	like it's way worse.	
6	I mean the money that I incur, like	
7	that I get extra, I mean it is actually like	
8	I'm getting paid less when you consider that	
9	I have to have an apartment, a place to stay	
LO	during the week.	
L1	Q. What is that apartment costing you a	
L2	month?	
L3	A. 1,950 plus utilities.	
L4	Q. And you just live there alone?	
L5	A. (Witness nodded).	
L6	Q. During COVID, did you have were	
L7	you able to work from home or	
8.	A. I mean we I was for	
L9	MR. CARSON: Hey, guys.	
20	BY MR. GOLD:	
21	Q. You were, okay. You physically have	
22	to go into work now?	
23	A. Yes, we go into the office now. I	
24	have to be in there two, three times a week.	

```
Page 504
1
                   MR. GOLD: Jon, you have some
2
            exhibits I'll be approaching now. I
3
            have a couple -- I'm going to close
4
            out with this and just ask you to
5
            identify some of these exhibits.
6
                   Do you want to post them for
7
            me, Jon?
8
                   MR. CAVALIER: Certainly.
     BY MR. GOLD:
9
             I'll try to get you out of here so
10
       Ο.
11
    you can have some dinner. I cheated, I ate
12
     during one of these breaks. But I didn't eat
13
     all day, so it doesn't matter.
14
                   MR. CAVALIER: You're a smarter
15
            man than I am, Sid.
16
                   MR. GOLD: I got my wife here.
17
            Otherwise, I'd be drinking. Okay.
     BY MR. GOLD:
18
19
             It looks like this is a post. Can
       0.
     you identify this for the record at all, Ms.
20
21
     Barbounis?
22
       Α.
             Yes. It says Gregg doesn't want
23
     anything to do with the Tommy stuff. I
     testified to that.
24
```

Page 505 1 Have you ever seen that before? Q. 2 I testified to that earlier saying Α. 3 that he thought it was a throwaway project 4 and he -- that's why it wasn't increased 5 responsibility. It was something that he 6 pawned off on me because he didn't want to do 7 it. 8 And he also testified there was a Ο. point in time when Mr. Pipes told you that he 9 didn't want you involved in that Danny stuff 10 11 as well, correct? 12 Α. The Tommy stuff? 13 Ο. Tommy stuff. I'm sorry. Yes, Tommy 14 stuff. 15 Α. He didn't want anything to do with 16 the political aspect of it, but they were 17 still involved. We even brought Tommy, we were trying to get Tommy here in D.C. so he 18 19 could do an event on Capitol Hill. So when 20 was that dated? 21 This is dated --Q. 22 Α. Because I still have --23 -- August 20, 2018. Q. Yes. He -- yes. They even did work 24 Α.

		Page 506
1	after that with them publicly.	
2	Q. So you did actually see this? This	
3	is a text message, I take it, or an e-mail?	
4	A. I'm looking at the date. It says	
5	August 2018 it says, right?	
6	Q. Right.	
7	A. Date, August 2018. In November of, I	
8	think it was November of 2018 I think it was,	
9	they did a public event for Tommy Robinson on	
10	Capitol Hill.	
11	Q. Okay. But you got the is this	
12	something you saw back in November of, back	
13	in August of 2018?	
14	A. Yes.	
15	Q. Okay.	
16	MR. GOLD: Post the next one	
17	for me, Jon.	
18	MR. CARSON: I just want to	
19	keep an eye on the time, guys. We're	
20		
21	MR. GOLD: I'm wrapping up.	
22	This is the last report. I won't	
23	be after this, I'll be done. I	
24	just want to go through these. I	

```
Page 507
1
            have a couple of these documents, and
2
            we'll wrap it up.
3
                   THE WITNESS: Okay.
4
                   MR. CARSON: Okay.
5
                   THE WITNESS: I'll try to keep
6
7
                   MR. GOLD: I don't want to come
8
            back another day either, believe me.
            I don't want Ms. Barbounis to come
9
            back either.
10
11
     BY MR. GOLD:
12
             Okay. This is dated August 6, 2019.
       Ο.
13
     It looks like it's a message from
14
     215-910-2154. Is that your phone number?
15
             Yes, that's me, and Tricia.
      Α.
16
             It's a text message to Tricia
       0.
17
     McNulty, and it looks like it also went to a,
     I guess Lisa Reynolds. You sent it to
18
19
     yourself as well. August 6, 2019, thanks I'm
20
     here. I met a former Congressman on the
21
     train and he was like I'll get you a job
22
     anywhere, you should run for Congress. I was
23
     thinking with all my IRS debt.
24
             Who did you meet on the train?
```

Page 508 1 I forget his name. He was a local 2 congressman like from like back in the day 3 and he wrote a book, and he was just being 4 really nice to me. And --5 I think --Ο. 6 -- I was telling him, you know, --Α. 7 If I'm not mistaken, you had Ο. 8 testified that you had actually -- did you try to apply for a job with this congressman? 9 He's a form-, he was a former 10 Α. No. 11 congressman from like whatever, and I was -he was like, "You should, you should work 12 13 back in D.C." Because I said I like D.C. or 14 whatever. 15 How did you meet him? Were you Ο. 16 sitting next to him? 17 Yes. He sat -- like I was sitting so I could work at one of those like, you know, 18 tables and he said, "Can I sit here", because 19 20 it was a full train in the café part area, 21 and I said, "Sure". 22 Q. So was he trying to make an advance towards you or what? 23 No. He was just being a nice man. 24 Α.

Page 509 1 And this is on a train ride from Ο. 2 where? Where were you coming from? Where 3 were you going? 4 Α. I was either coming or going to D.C. 5 I don't remember which. 6 Okay. Q. 7 MR. GOLD: Next one, Jon. 8 BY MR. GOLD: 9 Ο. This also appears to be I guess a text message from you to Tricia McNulty. I'm 10 11 super pissed about the Tommy shit. DP is 12 acting like there was a whole team of MEF 13 people working on it. Gregg says let's 14 fund-raise off it and tells me to put a 15 proposal together. Everyone talked, everyone 16 I talked to loves it including Marc. Gregg 17 says we are getting bad press but has always 18 said bad press is good. We have more press 19 than ever and he downplays it, and now him 20 and DP are going to DC to talk to Bannon 21 about Tommy and the movement and I'm not 22 allowed to go. Raheem says I did everything 23 and said he was impressed on his own without prompting, but I'm watching him and getting 24

		Page 510
1	jealous. I know I'm a child. I get that I	
2	shouldn't look for credit but I want it. I	
3	know it's not cool but it's pissing me off.	
4	I kind of said it to Gregg and he said, "If	
5	you're doing it for credit, you're in the	
6	wrong business" if she doesn't want all the	
7	attention as if he doesn't want all the	
8	attention all the time.	
9	My question is: Do you recall	
10	sending that text message to Tricia McNulty	
11	and	
12	A. It definitely looks, it definitely	
13	looks familiar to me.	
14	Q. Okay.	
15	A. I mean I wouldn't have remembered	
16	that I had sent that before, but yes	
17	MR. GOLD: Next one, Jon. I	
18	think the court reporter is going	
19	crazy.	
20	THE COURT REPORTER: (Shook	
21	head in the affirmative).	
22	THE WITNESS: I talk a lot.	
23	I'm sorry.	
24	MR. GOLD: Do you need a break	

```
Page 511
1
            or something?
2
                   THE COURT REPORTER: A little
3
            late now, but thank you.
4
                   MR. GOLD: Okay. I felt bad
5
            just watching you there. I get a
6
            guilty conscious very easily, by the
7
            way.
8
     BY MR. GOLD:
9
             Okay. This appears to be another
     text message from you to Tricia McNulty dated
10
11
     June 3, 2018. She wasn't understanding what
12
     I was asking because she didn't hear me out.
13
     She was like I don't want to be in the middle
14
     of you and Gregg and I feel you are fucking
15
     with me. Who is that in reference to?
16
       Α.
             I don't know.
17
             Who is the "she"?
             I don't know. I would have to see
18
       Α.
19
     the rest of the conversation. The only thing
20
     that -- I don't know.
21
             Could it be Marnie?
       Q.
22
      Α.
             Could be.
23
       Q.
             Okay.
24
                   MR. GOLD: Next one, Jon.
```

```
Page 512
1
     BY MR. GOLD:
2
             This is another text message from you
       Ο.
3
     to Tricia McNulty dated August 13, 2018
4
     (sic). I'm going to quit. Gregg does it on
5
     purpose. I'm looking for a job this week.
6
             And that would have been August 18,
7
     2018. Do you recall sending that text
8
     message?
             I don't recall sending it, but it
9
     definitely sounds like me.
10
11
                   MR. GOLD: Next one, Jon.
12
     BY MR. GOLD:
13
             Another text message dated
14
     September 26, 2018 from you to Tricia
15
     McNulty. I'm sending e-mails to DP and Gregg
16
     high as shit.
17
             What did you mean by "high as shit"?
             I don't know, I don't know what
18
       Α.
19
     that's referencing to, but it was probably --
20
     if it, if I was high as shit off anything, it
21
     was probably, I probably had a procedure or
22
     had a medical thing and I probably was still
23
     trying to work doing whatever that was.
             Was that in September of 2018 did you
24
       Q.
```

```
Page 513
1
     have a procedure, do you recall?
2
             I have procedures for my kidneys all
3
     the time. I think I definitely had a kidney
4
     stone while I was there and I showed it to
5
     them, so that was probably during that time.
6
             Okay. And you have no other
       0.
7
     independent recollection what that's about, I
8
     assume?
             It would -- I definitely think it was
9
     when I -- I had passed, during my time during
10
11
     there, an eight-millimeter stone. I don't
12
     know if you know what that is, but like it's
13
             No, I don't know.
14
      Q.
             -- this big.
15
       Α.
16
             Okay.
      Q.
17
                   MR. GOLD: Next one, Jon.
18
                   MR. CARSON: I'll also --
19
                   MR. GOLD: It's something I
20
            don't need to know.
21
                   THE WITNESS: Sorry. You
22
            asked.
23
                   MR. GOLD: Nor do I care to
24
            know, right.
```

```
Page 514
1
                   MR. CARSON: I'll put an
2
            objection to the characterization of
3
            the text, but keep going. Just keep
4
            going.
5
     BY MR. GOLD:
6
            Okay. This is a, --
       Q.
7
       Α.
          That's Ben.
8
            -- a photograph of someone. Do you
       Q.
     recognize that person?
9
       Α.
             Ben, Benjamin Baird.
10
11
             Ben Baird, okay. Do you recall if
       Ο.
12
     you took this picture?
13
             Yes, I did. He was sleeping. He
14
     looked cute.
15
             Where was this taken?
       Q.
16
             Washington, D.C.
       Α.
17
             Is this at a hospital room or is this
       Q.
     a bedroom? I can't --
18
19
             A hotel room.
      Α.
20
         Pardon me?
       0.
21
             I think it's a hotel room.
       Α.
22
       Q.
             Hotel room, okay. I couldn't tell
     from the reclining nature of the bed. I
23
24
     thought it looked like a hospital room.
```

```
Page 515
 1
       Α.
             He's asleep.
 2
       Ο.
             What hotel is this?
 3
       Α.
             I don't remember.
 4
             Okay. Do you remember, do you recall
       Ο.
 5
     the point in time you took it, like time
 6
     frame-wise at all?
 7
       Α.
             No.
 8
       Q.
             Okay.
 9
                   MR. GOLD: Next one, Jon.
10
                   THE WITNESS:
                                  I sent that to
11
            him. He looked cute in that.
12
                   Sorry, I'm just so
13
            uncomfortable. Here we go.
14
     BY MR. GOLD:
15
             This is a text message from you to
       Ο.
16
     Tricia McNulty dated May 3, 2018, and you
17
     state there I want to kill Gregg. Do you
18
     recall what precipitated that e-mail or text
19
     message rather?
20
             Didn't I tell you that his harassment
21
     of me was constant and never-ending? So it
     could have been a million -- it could have
22
23
     been any day of the week.
             Okay. But you don't have any precise
24
       Q.
```

```
Page 516
 1
     recollection as to what --
 2
       Α.
             No. Did it all the time.
 3
       Ο.
             Okay.
 4
                   MR. GOLD: Next one, Jon.
 5
     BY MR. GOLD:
 6
             Text message dated January 26, 2018
       Ο.
 7
     again from you to Tricia McNulty. Grrrr, and
 8
     then Gregg is acting like I'm his bitch in
     front of Sam. And who is Sam, by the way?
 9
             Sam Westrop is a project director.
10
       Α.
11
             And do you have any recollection of
       Ο.
12
     having sent that to Tricia?
13
             I don't have any recollection of
14
     sending that to Tricia. However, there's
15
     only been a handful of times that I was in
16
     front of Sam because he works in Boston, so
17
     it had to be one of the times we were in D.C.
18
             Any recollection what that's about or
       Ο.
19
     not really?
20
             He treated me like that in front of
       Α.
21
     people all the time.
22
                   MR. GOLD: Next one, Jon.
     BY MR. GOLD:
23
24
             Okay. This is a text message -- I'm
       Q.
```

```
Page 517
1
     sorry. Is this a text message or an e-mail?
2
     I can't tell. It looks like a text message.
3
      Α.
             Maybe.
4
             Okay. It's from Vasili Barbounis to
       Q.
5
     you dated October 1st. That is your phone
6
    number, right?
7
      Α.
             Yes.
8
       Q.
          Okay.
9
      Α.
             Yes.
             October 1, 2019. Any word from the
10
      Ο.
11
    MEF attorney?
12
                   MR. CARSON: I --
13
     BY MR. GOLD:
14
             We need a boost. I just two offers
       Q.
     for a total of 600K and my client just
15
16
     increased her price range to 1.6. Time to
17
    pay bills.
18
                   MR. CARSON: So let me just put
19
            an objection on the record. So I'm
20
            going to let her answer the question,
21
            but we're not waiving any marital
22
            privilege or spousal privilege. But
23
            you can answer the question.
     BY MR. GOLD:
24
```

```
Page 518
1
             Yes, I'm not asking you to discuss
2
     what you and your husband talked about, but
3
4
             Well, he was just asking me "any word
      Α.
5
     from the MEF attorney", period.
6
             Right.
       Ο.
7
             Next question. Then he goes "we need
       Α.
8
     a boost". Then he just wrote "I just two
     offers for a" -- that means he just put under
9
     contract two offers for 600K, and "our client
10
11
     just increased her price range to 1.6".
12
     That's all positive. And he's saying that's
13
     positive. It's time to pay bills. You're
14
     not reading that correctly.
15
             No, no, I'm reading correctly. I
       0.
     just wanted you to acknowledge the fact that
16
17
     your husband sent you that text message. I'm
     not here to, you know, --
18
19
       Α.
             Oh.
                  Okay.
20
             -- cross-examine you on --
       0.
21
                   MR. CARSON: Lisa, go through
22
            them so we can get out of here.
23
                   THE WITNESS: Whatever.
24
                   MR. GOLD: Next one.
```

```
Page 519
1
     BY MR. GOLD:
2
             Here's another one from your husband.
       Ο.
3
     Don't forget we need 2K money back from
4
     Tommy. What's he referring to there when he
5
     says "2K money from Tommy"?
6
       Α.
             I was --
7
                   MR. CARSON: Objection. I'm
8
            just going to put an objection on the
            record. You can answer. But we're
9
            not waiving any marital/spousal
10
11
            privilege.
12
                   MR. GOLD: Understood.
13
                   THE WITNESS: When --
14
                   MR. CARSON: Sidney, just so I
15
            don't have to keep interrupting, just
16
            generally if you're going to ask her
17
            about the texts between her and
18
            Vasili, I'll just make that general
19
            objection and then I'll shut up.
20
            Okay?
21
                   MR. GOLD: Okay, that's fine.
22
     BY MR. GOLD:
23
             Go ahead. What's the -- had you lent
       Q.
     Tommy $2,000?
24
```

		Page 520
1	A. No. No. No. When I was in	
2	England, we were talking like Tommy and I	
3	were talking about the potential of him	
4	paying me for my help, but he didn't and I	
5	wasn't going to take it. So my husband is	
6	like, "You need to get that two grand he	
7	was like, you know, he said he would pay	
8	you back". But we didn't and I never did,	
9	and that was it.	
LO	Q. And at some point, I think you were	
L1	asked about the \$7,000 that Tommy had	
L2	received from I guess you gave Tommy	
L3	\$7,000 of MEF funds. Do you recall that?	
L4	A. No, no, no, no. I never gave	
L5	anybody any money.	
L6	Q. So how did that come about?	
L7	A. You're definitely mischaracterizing,	
L8	I think you're confusing Danny and Tommy.	
L9	Q. I'm sorry, Danny. I'm sorry, go	
20	ahead. With Danny?	
21	A. So that says Tommy, and Tommy was	
22	talking about working at	
23	Q. Tommy owed you two grand, and	
24	A. He doesn't owe me anything actually.	

```
Page 521
 1
             Okay. But you say he promised to pay
       Q.
 2
     you for your services --
 3
             No, no, no, no. My husband thought
       Α.
 4
     that I should get paid for working at the
 5
     campaign for my time over there.
 6
             Okay.
       Ο.
 7
             But you can't get paid. You can't,
       Α.
 8
     so like that's what he's referencing. I
     can't get paid for my work for Tommy because
 9
     of election laws in England. So like that's
10
11
     a non-issue.
12
             And the $7,000 was to Danny, correct?
       Ο.
13
             I don't know about $7,000.
       Α.
14
                   MR. CARSON: Yes.
15
                   MR. GOLD: Okay. Next one,
16
            Jon.
17
     BY MR. GOLD:
18
             Here we go. This is from you to your
       Q.
     husband, October 17, 2019. I saw the e-mail
19
20
     for Green Lane. Is that where you live?
21
             No. That's my kids' school.
       Α.
22
       Q.
             Oh, okay.
23
             We are drowning. I guess he stopped
     paying tuition bills at the school or --
24
```

```
Page 522
1
             I don't know what that was
2
     referencing, honestly.
3
                   MR. CARSON: Same objection.
4
     BY MR. GOLD:
5
             Do you recall seeing the e-mail about
6
    Green Lane?
7
      Α.
             I don't -- do you know how many
8
     e-mails I got from Green Lane?
9
            How many?
      Q.
             I get, I get, I still get e-mails
10
       Α.
11
     from Green Lane. My kids go to school there.
12
      0.
            Are you current with your tuition
13
     there?
14
      Α.
             Yes.
15
             Okay. So I guess at some point in
       Q.
16
     time you fell behind?
17
             I don't know. I don't know what the
     context of that is, and I don't think so.
18
19
      Q.
          I see.
20
          We're always pretty good with our
21
     tuition.
22
      Q.
             It was October 2019. Both your kids
     are in private school?
23
24
      Α.
             Yes.
```

```
Page 523
 1
                   MR. GOLD: Next --
 2
                   THE WITNESS:
                                  No. My son is in
 3
            a daycare, and my daughter is in a
 4
            private school.
 5
     BY MR. GOLD:
 6
             It's called Green Lane?
       Ο.
 7
                  My son is in Green Lane, that's
       Α.
             No.
 8
     the daycare, and my daughter is in
     Philadelphia Classical School.
 9
             And that's a private school?
10
       Ο.
11
       Α.
             Yes.
12
       Q.
             Okay.
13
                   MR. GOLD: Next one.
14
     BY MR. GOLD:
15
             This is dated December 7, 2018,
       Ο.
     again, from you to your husband. Me and Avi
16
17
     and Tommy might start our own thing.
18
             Do you recall what you meant by that
     or what you were intending to say by that?
19
20
             Avi was talking about, Avi was
       Α.
21
     talking about like starting a new like TR
22
     News and like, you know, working together and
23
     like doing our own like little project, and I
     forget what it exactly was but it surrounded
24
```

```
Page 524
1
     around news.
2
                   MR. GOLD: Next one, Jon.
3
     BY MR. GOLD:
4
            Did you tell Gregg, by the way, you
      Ο.
5
     were going to start the project with Tommy
6
     and Avi?
7
             It was an idea that Avi threw out. I
      Α.
8
     mean nothing ever -- we never even really
     went into the nuts and bolts of it. I don't
9
     even know if he even talked about it with
10
11
     Tommy, so I don't know.
12
            If that had happened, would you have
      0.
13
     left MEF?
14
      Α.
            Maybe. Depending on what it was, you
     know, like if it was going to generate
15
16
     revenue or anything.
17
            Here's another text message from you
     to your husband. Yes. I'll be home. I
18
     might have a great plan. The time frame is
19
20
     November 1, 2018. Any idea what that's
21
     about?
22
      Α.
            It could have been anything.
23
                   MR. CARSON: Objection.
24
     BY MR. GOLD:
```

```
Page 525
             I'm sorry, I missed the answer to
1
       Q.
2
     that.
3
       Α.
             It could have been anything. I don't
4
            I would have to see the rest of the
5
     text messages.
6
             There was some reference to a Gregg
       Ο.
7
     plan before. Is this in line with that or --
8
       Α.
             No, not the same thing.
9
             Okay. Same thing as the Gregg plan?
       Q.
             There was no Gregg plan.
10
       Α.
11
                   MR. CARSON: Objection.
12
                   THE WITNESS: There was no real
13
            Gregg plan. The only thing with the
14
            Gregg plan was that we were going to
15
            finally all go together and tell
16
            Daniel the truth. That was the Gregg
17
            plan.
18
     BY MR. GOLD:
19
             That was the Gregg plan?
       Q.
20
             I told you that. We testified to
21
     that earlier.
22
       Q.
             So you don't know -- and is this the
23
     same plan?
24
             No. I mean I make plans all the
       Α.
```

		Page 526
1	time. I have great plans for Halloween	
2	costumes.	
3	Q. Okay. So it could have been about a	
4	Halloween costume you were	
5	A. Well, obviously not on November 1st,	
6	but like we do plan family Halloween	
7	costumes. We did it this year too.	
8	Q. Maybe you were planning a year ahead	
9	of time, like Mummers' Parade or something.	
LO	A. I don't know.	
L1	MR. GOLD: Next one, Jon.	
L2	THE WITNESS: It could have	
L3	been anything, honestly. It could	
L4	have been	
L5	MR. GOLD: Next one, Jon.	
L6	THE WITNESS: It could have	
L7	been for his, going to see his	
L8	parents or something. I had a plan	
L9	for that.	
20	Like when I got money, I	
21	surprised him and like put it out	
22	ahead of time so he could see his	
23	mother who he hasn't seen in two	
24	years.	

```
Page 527
1
                   MR. CARSON: There's a very
2
            easy solution for this. If you guys
3
            have partial texts and you'd like to
4
            see the context of those texts, just
5
            let me know what they are, and we'll
6
            get them for you.
7
                   MR. GOLD: We'll hold you to
8
            that. We'll let you know.
     BY MR. GOLD:
9
10
      Ο.
             By the way, why are you using Penn
11
     e-mail address? Were you enrolled in Penn?
12
      Α.
             I don't know. I think that is
13
    because that's my iCloud. So, if these are
14
     coming from messages, that's what I use as my
15
     iCloud I think. I don't think that that's --
16
     because I don't have access to the Penn
17
     e-mail address anymore.
             So it just automatically drops into
18
      Ο.
     that e-mail automatically?
19
20
             I que- -- I mean yes. Because I
21
     don't -- like when I text people, I don't
     like send it to my e-mail.
22
23
      Q.
             Okay.
24
                   MR. GOLD: Next one, Jon.
```

```
Page 528
1
    BY MR. GOLD:
2
            Okay. This is another text message
      0.
3
    to your husband dated October 30, 2018. If I
4
    didn't have this Tommy thing, I'd quit today.
5
             Is that a text message that you sent
6
    to your husband on October 30, 2018?
7
      A.
            Yes. If I didn't have --
8
                   MR. CARSON: Object.
                   THE WITNESS: -- the Tommy
9
           project, I would have quit.
10
11
                   MR. GOLD: Okay. Next one,
12
           Jon.
    BY MR. GOLD:
13
14
      Q. A text message to your husband dated
    October 4, 2018. I planned the whole entire
15
16
    Tommy thing in London. I invited Tricia
17
    because I wanted company. Now the
18
    president -- and I can't see what that says
19
    because of the --
20
                   MR. CARSON: "Thinks".
21
                   MR. GOLD: Let me try something
           different here and see if I can --
22
23
                   MR. CARSON: "Now the president
            thinks".
24
```

Page 529

BY MR. GOLD:

Q. And now the president thinks both of us planned it. But it's mine. Now we are doing another event. He included her in the e-mail. So I responded with my ideas and took her off the chain because she didn't do a thing with the first two. I told her about my suggestions to see if they were good and then she goes back to her office and sends this...I am somehow taken off the e-mail Lisa just sent, but she didn't tell me about it. I think it's a great idea to make this more structured as she mentioned.

I also think in addition to an on-stage interview with Tommy, we could make this more in line with how a press conference would run rather than a rally, and take some questions from journalists who are there (prescreened and planned would probably be the best).

Is that a text message you sent to your husband?

A. Uh-huh.

MR. CARSON: I'm just going to

```
Page 530
1
            object.
2
                   MR. GOLD: I hear you reserving
3
            your objection on the marital
4
            privilege, Seth.
5
                   MR. CARSON: Okay.
6
     BY MR. GOLD:
7
             And you can authenticate that as
       Ο.
8
     being your text message, correct?
9
             Uh-huh.
       Α.
10
       Q.
             Okay.
11
                   MR. GOLD: Next message.
12
                   THE COURT REPORTER: Yes?
13
                   THE WITNESS: Yes. Sorry.
14
            Thank you.
15
                   MR. GOLD: Next one.
16
     BY MR. GOLD:
17
             Okay. This is from June 19, 2018,
     again, from you to your husband. Gregg gave
18
19
     London to the guy he is firing a parting
20
     gift, he is firing as a parting gift. I'm so
21
    mad.
          Do you recall what that's about?
22
       Α.
             Yes. The second London trip, I told,
     I testified to this earlier. He said that he
23
     was going to fire Cliff and that he's giving
24
```

		Page 531
1	it to him as like a parting gift for	
2	because he wants to throw him a bone before	
3	he fired him, and then he actually never	
4	fired him anyway.	
5	Q. I want to clarify one point on the	
6	IRS debt. Are you telling me that your	
7	you have a lien against you, but your wages	
8	are not being garnished, I take it, correct?	
9	A. Correct. They're not, no.	
LO	Q. Okay. Are your husband's wages being	
L1	garnished?	
L2	A. No. Because we are working with the	
L3	IRS to resolve our issues, thanks to my help.	
L4	MR. GOLD: Go to the next one.	
L5	I'm sorry.	
L6	BY MR. GOLD:	
L7	Q. Another text message to your husband,	
L8	April 4, 2018. Except bitch Marnie got here	
L9	at 7:30. Any recollection what that's about?	
20	A. I told you me and Marnie weren't on	
21	the greatest terms for a while.	
22	Q. How come?	
23	A. Because she was Gregg's little	
24	henchman.	

Page 532 1 And you thought that she was -- why 2 do you say that, Number 1? Number 2, did you 3 distrust her? 4 I told you I was -- Marnie was like 5 whatever -- she would always like defend 6 Gregg for weird stuff he did, and she just 7 like -- she certainly just wasn't like --8 like she felt like she was like, you know, sided with Gregg just because she was his 9 (sic) boss, which she probably was because 10 11 she was probably scared of him too, but I 12 didn't take it like that when I was there. 13 Ο. When is the last time you spoke with 14 Marnie? Months ago. No, it was probably a 15 Α. year ago. I don't even know. 16 17 When is the last time you spoke with Tricia McNulty? 18 19 Yesterday. Α. 20 Did both of you prepare for your 21 depositions together? 22 Α. I was actually just talking No. 23 about the election. She was wishing me good luck. 24

```
Page 533
1
      Q.
          Okay. And --
2
            She's having a baby. We talked about
      Α.
3
    her baby.
4
            And have you spoken to Delaney
      Ο.
5
    Yonchek recently?
6
            No. That's been over a year at
      Α.
7
    least. I think I wished her a happy birthday
8
    somewhere on Instagram once, but no.
9
                   MR. GOLD: Can I get the next
10
            one, Jon?
11
                   MR. CARSON: Yes, we're going
12
           on nine hours now, guys. Keep an eye
13
            on that.
14
                   MR. GOLD: We're almost done.
15
                   MR. CAVALIER: We're almost
16
           through.
17
    BY MR. GOLD:
18
            This is another text message from you
      0.
19
    to your husband. It says you are a bigger
20
    piece of shit than I thought. You told
21
    Tricia I punched YOU. Is that --
22
      Α.
            I don't remember what the hell that's
23
    about.
24
      Q. Okay. It's --
```

			Page 5	34
1	А.	When was that?		
2	Q.	You have no recollection of that at		
3	all?			
4	А.	No.		
5	Q.	By the way, that address, that		
6	lisarey	g@sas.upenn.edu, do you recall whether		
7	you had	d represented that you you mentioned		
8	that ac	ddress, you back it up on the cloud.		
9	Is that	t let me get you straight on that.		
10	What di	id you actually say about the		
11	Α.	I think the only thing that makes		
12	sense to me, because it's like on all these			
13	message	es, is that that's my log-in e-mail for		
14	my iClo	oud.		
15	Q.	Okay. The		
16	А.	Even though I don't have access to		
17	that e-	-mail, it's still like the username		
18	part of	the AppleID Cloud.		
19	Q.	But didn't you deny using that e-mail		
20	on your	c, you backed it up on your iCloud when		
21	you too	ok an affidavit back in January or you		
22	don't r	recall that?		
23	Α.	What did you say?		
24	Q.	Back in January, you made a statement		

		Page 535
1	in the trade secret case that you did not	
2	back that up on a cloud.	
3	A. I don't have I don't back anything	
4	up on a cloud, like back up on a cloud. Like	
5	I don't do a regular backup.	
6	I think that these were like, when	
7	you use your AppleID, I don't know how	
8	that works, but like that's the only thing	
9	that makes sense about that e-mail. Because	
LO	I don't have access to that e-mail, and I	
L1	don't like regularly back up my phone. Like	
L2	it does whatever it does by itself, but	
L3	Q. Do you use an Apple phone?	
L 4	A. Yes.	
L5	Q. Okay. Have you ever checked you	
L6	can actually check on the phone whether you	
L7	backed up anything on the cloud. Have you	
L8	recently checked that?	
L9	A. No.	
20	MR. CARSON: They looked at her	
21	iCloud, and they found all these	
22	documents.	
23	BY MR. GOLD:	
24	Q. Have you ever used a Telegram app at	

			Page	536
1	all?			
2	A.	Not since I left Middle East Forum.		
3	Q.	So did you provide the Telegram app		
4	to your	counsel		
5	A.	Uh-huh.		
6	Q.	as your Telegram account?		
7	A.	I gave them all the passwords to		
8	that, y	res.		
9	Q.	How about the Telegram conversations		
LO	that yo	ou had, did you provide them to your		
L1	counsel	as well?		
L2	A.	I don't I haven't had the app		
L3	since I	left The Middle East Forum. So		
L 4	whateve	er access they have, I gave them like		
L5	whateve	er that log-in or whatever they needed		
L6	was, an	d they took, they took my phones.		
L7	Q.	You mean the factory authorization?		
L8	A.	Anything that they needed, yes. We		
L9	had to	go through two factory authorizations		
20	for a l	ot of things.		
21	Q.	Did you ever use Signal?		
22	A.	Hardly ever, no. Gregg made me		
23	downloa	d that and Wickr. I never really used		
24	them.			

		Page 537
1	Q. Did you ever use Wickr when you	
2	worked at MEF?	
3	A. No. I think Gregg might have	
4	messaged me once or twice like testing it	
5	out, but no, never that wasn't my thing.	
6	Q. How about ProtonMail?	
7	A. ProtonMail I had access to the press	
8	e-mail inbox for Tommy Robinson and I would	
9	check that for him occasionally, but I	
LO	haven't accessed that in forever.	
1	Q. Did you ever use ProtonMail or Signal	
L2	to talk to Ryan Coyle?	
L3	A. Ryan Coyne.	
L4	Q. Ryan Coyne.	
L5	A. Yes. I think I talked to, I	
L6	definitely think I talked to Ryan on Signal	
L7	when I thought my account was being hacked by	
L8	Gregg, yes.	
L9	Q. So then you did have the Signal	
20	application on your phone?	
21	A. Yes. It's not something I regularly	
22	use. I forgot about that.	
23	Q. Did you ever talk to a Ryan Coyne	
24	about this case?	

```
Page 538
 1
       Α.
             I have talked to him about this case,
 2
     yes.
 3
             When is the last time you spoke with
       Ο.
 4
    him?
 5
             About my case?
       Α.
 6
             Yes.
       Ο.
 7
       Α.
             Not since like that deposition,
 8
     Delaney's deposition.
 9
             Did you ever call Ryan Coyne, did you
     call Ryan Coyne and ever told you to go to
10
11
     NPR and take your story public?
12
                   MR. CARSON: I'm going to do
13
            like a five-minute warning for
14
            everyone. Because at 8:00 we're
15
            going to wrap this up.
16
                   MR. GOLD: Fine.
17
                   THE WITNESS: Did I ever do --
18
            I mean plenty of people told me to go
19
            tell a story. I would never do that
20
            though because it's not good for me.
21
     BY MR. GOLD:
22
       Q.
             Did you ever discuss that with Ryan
23
     Coyne?
             I don't remember.
24
       Α.
```

```
Page 539
1
      Q.
            How about with Tricia McNulty?
2
      A.
            I don't remember. I might have.
3
                   MR. GOLD: Get that next one up
4
            there for me, Jon.
5
     BY MR. GOLD:
6
      Q. Okay. This is one from you to your
7
    husband dated December 13, 2017. Punching
8
     your wife in the head while she is on the
     ground and your kid is on the bed is another.
9
10
            Do you recall sending that to your
11
    husband?
12
      Α.
            No.
13
                   MR. CARSON: Objection. These
14
            are very personal --
15
                   MR. GOLD: Put the next one up
16
            for me, Jon.
17
                   MR. CARSON: -- communications
18
            between a husband and wife. They're
19
            all privileged and --
20
                   MR. GOLD: You preserved that
21
            objection, Mr. Carson.
22
    BY MR. GOLD:
23
            Here's another one from you to your
      Q.
    hu-, from you to it looks like to Dave
24
```

```
Page 540
1
     Reynolds and your husband. Tommy Robinson
2
     wants to speak with me. That's dated
3
     October 2, 2018.
4
             Is that a text message you recall
5
     sending to both I guess --
6
                   MR. CARSON: Same objection.
7
                   THE WITNESS: I don't know.
8
            These are all without context. I
            have no idea.
9
     BY MR. GOLD:
10
11
             When you turned in your MEF computer
       Ο.
12
     and you reset it to factory settings, who
13
     told you to do that?
14
      Α.
             Marnie.
15
             And when did she tell you to do that,
16
    do you recall?
17
             In a conversation that we had in
     person on the phone. We talked about a
18
19
     bunch.
20
      Q. And then thereafter is when you reset
21
     it to factory settings?
22
      Α.
             Yes. I had to like look up how to do
23
     it.
             And where did you -- how did you do
24
       Q.
```

		Page 541
1	it?	
2	A. I don't remember. Like I looked, I	
3	Googled it, did whatever they said and did	
4	it. I don't remember exactly what the	
5	methodology was.	
6	Q. Do you remember specifically she told	
7	you to reset it to factory settings?	
8	A. Yes. She said like, she said that,	
9	you know, to protect your personal	
10	information, because it was supposed to be	
11	like your personal device, like basically	
12	like a lease thing, that was the policy, she	
13	was like, "Since it's a you know, reset it	
14	to factory settings so that we can use it for	
15	like the next person". So that's what we	
16	did.	
17	Q. And you clearly looked it up and you	
18	did it yourself?	
19	A. Yes.	
20	Q. And that would be in August of 2019?	
21	MR. CARSON: Objection.	
22	THE WITNESS: I guess. Right	
23	before yes, probably. Because	
24	it's right before I left, right, yes.	

```
Page 542
1
     BY MR. GOLD:
2
             And if Marnie were to testify that
       Ο.
3
     you did that on your own initiative, would
4
     she be being less than candid or truthful?
5
                   MR. CARSON: Objection.
6
            Assuming facts not in evidence.
7
                   THE WITNESS: She would
8
            definitely be not truthful.
9
                   MR. GOLD: Okay. Can I get the
10
            next one, Jon?
11
     BY MR. GOLD:
12
             This is another one from, it looks
       Ο.
     like from your mother to you dated
13
14
     October 31, 2019. No, I'm in a great mood.
     I just don't like the absence of a mother on
15
16
     days that are important to kids. And I don't
17
     think it's smart of you to post sexy,
18
     provocative photographs of yourself on
19
     Instagram. It's not a good scenario for you
20
     and your family and your lawsuit.
21
             I think you may have referred to that
22
     when we were talking about the, you know, the
23
     counseling and the mention of your mom and
     things like that. Is that accurate?
24
```

		Page 543
1	A. Yes. That was about Halloween.	
2	Q. Okay. Do you have a phone number in	
3	England, by the way? Do you have an England	
4	phone number?	
5	A. For a while, I paid for like a, what	
6	was it, like a Skype phone number that would	
7	just like go to my phone.	
8	Q. And what about do you have a D.C.	
9	phone number as well?	
LO	A. I have a work phone that my work	
L1	provides me.	
L2	Q. Would that be area code 202, right?	
L3	You're in Washington.	
L 4	A. Uh-huh.	
L5	THE COURT REPORTER: Yes?	
L6	BY MR. GOLD:	
L7	Q. And the England phone number, that	
L8	would be with a plus 44. Do you recall that	
L9	at all?	
20	A. Yes.	
21	Q. Okay. Did you hand over your	
22	Telegram account to counsel as requested	
23	during discovery in this case?	
24	A. Yes.	

```
Page 544
1
       Q.
            Okay. So -- okay.
2
                   MR. GOLD: Jon, next one.
3
                   MR. CARSON: Guys, it's 8:00
4
            now.
5
                   MR. GOLD: The last one.
6
     BY MR. GOLD:
7
             It's from your mom to you and your
      Ο.
8
     dad. Oh back to the big threat of no
     grandchildren. I think that's from -- you
9
     got that from your mother? You received that
10
11
     text message?
12
      A.
            Uh-huh.
13
                   THE COURT REPORTER: Yes?
14
                   THE WITNESS: Yes.
     BY MR. GOLD:
15
16
            Do you know why your counsel hasn't
17
     turned over your Telegram account? Did you
18
     instruct your counsel not to do that?
19
            No. I didn't know it wasn't turned
      Α.
20
     over. Maybe it didn't produce anything, I
21
    don't know.
22
      Q.
            Are you aware of the various motions
     for sanctions and motions for contempt that
23
    have been filed in this case?
24
```

		Page 545
1	A. I mean I heard that you guys file	
2	stuff every other day.	
3	Q. Did your lawyer tell you that he was	
4	found in contempt of court on two occasions	
5	in this case?	
6	A. For?	
7	Q. Whatever. Have you ever had a	
8	conversation with him about that?	
9	MR. CARSON: Lisa, don't answer	
10	that question.	
11	THE WITNESS: I have no idea	
12	actually, Seth.	
13	MR. CARSON: Just don't answer.	
14	MR. GOLD: Okay.	
15	MR. CARSON: All right, we're	
16	done. Thank you, guys.	
17	MR. GOLD: Thank you.	
18	Appreciate it. Thank you.	
19	MR. CAVALIER: Seth, before we	
20	go off the record and rather than	
21	having to go through all of the	
22	argument, I have one yes-or-no	
23	question. Do you object to me asking	
24	it before we go off?	

		Page 546
1	MR. CARSON: No.	
2	MR. CAVALIER: All right.	
3	MR. CARSON: No objection.	
4	MR. CAVALIER: Thank you.	
5		
6	EXAMINATION	
7		
8	BY MR. CAVALIER:	
9	Q. So we're at the end of a very long	
10	day. I just want to remind you that you're	
11	still under oath, and I'd like just a	
12	yes-or-no answer to this question with that	
13	oath in mind.	
14	Did you ever use cocaine with Danny	
15	Thomas at any point in time during your	
16	relationship with him?	
17	A. No.	
18	MR. CAVALIER: That's all I	
19	have, Seth.	
20	MR. CARSON: All right.	
21	MR. CAVALIER: Thank you.	
22	THE VIDEOGRAPHER: The time is	
23	8:01 p.m. That concludes this	
24	videotape deposition.	

```
Page 547
 1
 2
                      CERTIFICATE
 3
 4
 5
                   I HEREBY CERTIFY that the
 6
     witness was duly sworn by me and that the
 7
     deposition is a true record of the testimony
 8
     given by the witness.
 9
10
11
12
13
             Kimberly S. Gordon, a
14
             Registered Professional Reporter,
15
             Certified Court Reporter
16
             and Notary Public
17
             Dated: NOVEMBER 19, 2020
18
19
20
                   (The foregoing certification
21
     of this transcript does not apply to any
22
     reproduction of the same by any means,
23
     unless under the direct control and/or
24
     supervision of the certifying reporter.)
```

		Page	548
1	INSTRUCTIONS TO WITNESS		
2			
3			
4	Please read your deposition		
5	over carefully and make any necessary		
6	corrections. You should state the reason in		
7	the appropriate space on the errata sheet		
8	for any corrections that are made.		
9	After doing so, please sign		
10	the errata sheet and date it.		
11	You are signing same subject		
12	to the changes you have noted on the errata		
13	sheet, which will be attached to your		
14	deposition.		
15	It is imperative that you		
16	return the original errata sheet TO THE		
17	DEPOSING ATTORNEY within thirty (30) days of		
18	receipt of the deposition transcript by you.		
19	If you fail to do so, the deposition		
20	transcript may be deemed to be accurate and		
21	may be used in court.		
22			
23			
24			

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				Page 549
1				
2			E R R A T A 	
3	PAGE	LINE	CHANGE	
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
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15				
16				
17				
18				
19				
20				
21				
22				
23				
24				

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		Page 550
1	ACKNOWLEDGMENT OF DEPONENT	
2		
3		
4	I,, do	
5	hereby certify that I have read the	
6	foregoing pages, 1 - 550, and that the same	
7	is a correct transcription of the answers	
8	given by me to the questions therein	
9	propounded, except for the corrections or	
10	changes in form or substance, if any, noted	
11	in the attached Errata Sheet.	
12		
13		
14		
15	LISA REYNOLDS-BARBOUNIS DATE	
16		
17		
18		
19	Subscribed and sworn	
20	to before me this day of, 20	
21	My commission expires:	
22		
23	Notary Public	
24		

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